

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, DONNA PRICE,  
JEFFREY SCHOENBERG,**

**and**

**COALITION FOR GOOD  
GOVERNANCE, LAURA DIGGES,  
WILLIAM DIGGES III, RICARDO  
DAVIS, AND MEGAN MISSETT,**

**Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, in his  
Official Capacity as Secretary of State  
for the State of Georgia and *ex officio*  
Member of the Georgia State Election  
Board, and SARA GHAZAL, DR.  
JANICE JOHNSTON, EDWARD  
LINDSEY, AND MATTHEW  
MASHBURN, in their official capacities  
as Members of the Georgia State  
Election Board,**

**Defendants.**

**Civil Action No. 1:17-CV-2989-  
AT**

**[PROPOSED] PRETRIAL ORDER**

1.

There are no motions or other matters pending for consideration by the court except as noted:

**Plaintiffs Statement:** Plaintiffs' renewed motions for attorneys' fees and costs and for sanctions are pending with the Court. [See Docs. 967, 998.] As Plaintiffs previously explained, they are under tremendous financial stress and hardship with these motions outstanding and with the mounting, enormous costs of this litigation, which will increase significantly with trial. Plaintiffs also intend to file one motion *in limine* concerning Defendants' planned use of the untimely and otherwise improper MITRE Report. Plaintiffs reserve the right to file additional motions as appropriate and necessary. Plaintiffs also reserve the right to file motions for judicial notice as appropriate in advance of trial.

**Defendants' Statement:** Defendants, as of December 7, 2023, have filed a consolidated motion *in limine* addressing several issues. The following additional motions or other matters remain pending for consideration by the Court prior to trial: (1) status of legal counsel of Plaintiff Ricardo Davis<sup>1</sup>, [Docs. 1718, 1719, 1720, 1721]; (2) joint statement regarding expert disclosures, [Doc. 1716]; and (3)

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<sup>1</sup> Defendants understand this issue will be resolved prior to the pretrial conference, in which case it can be removed.

Motion to Intervene, [Docs. 1706, 1711, 1726]. Defendants further state that attorney-fee motions are not relevant to the trial issues before this Court.

2.

All discovery has been completed, unless otherwise noted, and the court will not consider any further motions to compel discovery.

**Plaintiffs' Statement:** Discovery closed over a year ago. Any discovery sought by Defendants now is untimely. Plaintiffs reserve the right to seek the full scope of discovery on the untimely and improper MITRE Report afforded by the Federal Rules should the Court allow Defendants to introduce it or evidence pertaining to it at trial, which Plaintiffs oppose. Plaintiffs also reserve the right to seek—and use at trial—additional discovery as appropriate and necessary should unforeseen circumstances develop or new information comes to light that a party could not obtain through reasonable diligence previously.

**Defendants' Statement:** The Parties' joint statement on disclosure of Dr. Halderman's methods remains pending. Having failed to comply with their Rule 26 obligations, Defendants oppose any testimony relying upon these undisclosed methods.

3.

The names of the parties as shown in the caption to this Order and the

capacity in which they appear are correct and complete, and there is no question by any party as to the misjoinder or non-joinder of any parties.

**Plaintiffs' Statement:** The Curling Plaintiffs' Third Amended Complaint and the Coalition Plaintiffs' First Supplemental Complaint name members of the State Election Board in their official capacities. For the Court's reference, David J. Worley, Rebecca N. Sullivan, Anh Lee, and Seth Harp are no longer members of the State Election Board, and have been replaced by Matthew Mashburn, Sara Tindall Ghazal, Edward Lindsey, and Janice W. Johnston. There are no questions or issues as to the non-joinder of parties for the Court to resolve.

**Defendants' Statement:** The Parties are properly named in the caption as the Secretary of State and current members of the State Election Board who have been replaced by rule because they are named in their official capacities. Defendants note, however, that questions may arise as to the non-joinder of parties depending upon the scope of relief, if any, ordered following trial.

4.

Unless otherwise noted, there is no question as to the jurisdiction of the court; jurisdiction is based upon the following code sections.

**Plaintiffs' Statement:** There is no question as to the Court's jurisdiction, which is based on the following statutes:

Curling Plaintiffs' Claims:

- Count III: Violation of Fundamental Right to Vote Under the Due Process Clause of the Fourteenth Amendment and of 42 U.S.C. § 1983.
  - Jurisdictional basis: 28 U.S.C. §§ 1331, 1343, and 2202.
- Count IV: Violation of Fundamental Right to Vote Under the Equal Protection Clause of the Fourteenth Amendment and of 42 U.S.C. § 1983.
  - Jurisdictional basis: 28 U.S.C. §§ 1331, 1343, and 2202.

Coalition Plaintiffs' and Ricardo Davis's Claims

- Count I: Threatened Infringement of the Fundamental Right to Vote in Violation of the Fourteenth Amendment's Guarantee of (Substantive) Due Process
  - Jurisdictional basis: 28 U.S.C. §§ 1331, 1343, and 2202.
- Count II: Threatened Infringement of the Fourteenth Amendment's Guarantee of Equal Protection
  - Jurisdictional basis: 28 U.S.C. §§ 1331, 1343, and 2202.

**Defendants' Statement:** Curling Plaintiffs' and Coalition Plaintiffs' remaining claims are brought under the First and Fourteenth Amendments to the United States Constitution: Counts III and IV of Curling Plaintiffs' Third Amended Complaint, [Doc. 627], and Counts I and II of the Coalition Plaintiffs' First

Supplemental Complaint, [Doc. 628]. Defendants state that this Court lacks jurisdiction over Plaintiffs' claims, in whole or in part, because Plaintiffs lack statutory and constitutional standing to bring their claims and their claims and the relief Plaintiffs seek raises issues of sovereign immunity, state sovereignty interests, and political questions. Defendants intend to raise these issues at trial.

If Plaintiffs have standing and their claims are not barred for sovereign immunity, state sovereignty interests, and as political questions, then, this Court has federal-question jurisdiction over Plaintiffs' claims "arising under the Constitution ... of the United States." 28 U.S.C. § 1331. Defendants are unaware of any claim necessitating invocation of this Court's supplemental jurisdiction under 28 U.S.C. § 1367, and object to any such new claims for similar reasons to those previously addressed in their motion to dismiss. *See* [Doc. 645-1 at 28–33]; [Doc. 751 at 30, n.18 (concerning Curling Plaintiffs' withdrawal of their State law declaratory judgment claim)].

5.

The following individually-named attorneys are hereby designated as lead counsel for the parties:

**Curling Plaintiffs:**

David D. Cross  
*Pro Hac Vice*

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Washington, DC 20037  
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Krevolin & Horst, LLC  
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Atlanta, GA 30309  
(404) 888-9700  
hknapp@khlawfirm.com

**Coalition Plaintiffs:<sup>2</sup>**

Bruce P. Brown  
Georgia Bar No. 064460  
BRUCE P. BROWN LAW LLC  
1123 Zonolite Rd. NE  
Suite 6  
Atlanta, Georgia 30306  
(404) 881-0700

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<sup>2</sup> The Coalition Plaintiffs, as used herein, means Coalition for Good Governance, Laura Digges, William Digges III, and Megan Missett.

**Defendants:**

Bryan P. Tyson  
Georgia Bar No. 515411  
TAYLOR ENGLISH DUMA LLP  
1600 Parkwood Circle, Suite 200  
Atlanta, GA 30339  
Telephone: 678-336-7249

Vincent Russo  
Georgia Bar No. 242628  
ROBBINS ALLOY BELINFANTE LITTLEFIELD LLC  
500 14<sup>th</sup> Street NW  
Atlanta, GA 30318  
Telephone: 678-701-9381

6.

Normally, the plaintiff is entitled to open and close arguments to the jury.  
(Refer to LR 39.3(B)(2)(b)). State below the reasons, if any, why the plaintiff  
should not be permitted to open arguments to the jury.

**Plaintiffs' and Defendants' Statement:** This case will not be tried before a jury.

The parties request the opportunity to present opening and closing arguments to the  
court, which they believe will assist the court in understanding and resolving the  
issues to be addressed and decided at trial. The Parties request that equal time be  
allocated between (1) all Plaintiffs, collectively, and (2) Defendants.

7.

The captioned case shall be tried (\_\_\_\_) to a jury or (   X   ) to the court



without a jury, or (\_\_\_\_\_) the right to trial by jury is disputed.

8.

State whether the parties request that the trial to a jury be bifurcated, i.e. that the same jury consider separately issues such as liability and damages. State briefly the reasons why trial should or should not be bifurcated.

**Plaintiffs' and Defendants' Statement:** This case will be tried to the court and no bifurcation is requested.

9.

Because this case will be tried to the court, the parties do not request any *voir dire* questions.

10.

Because this case will be tried to the court, the parties do not request any *voir dire* questions.

11.

Because this case will be tried to the court, the parties do not request any *voir dire* questions.

12.

Because this case will be tried to the court, the parties do not request any strikes.

13.

State whether there is any pending related litigation. Describe briefly, including style and civil action number.

**Plaintiffs' Statement:** There is no pending related litigation.

**Defendants' Statement:** The following related litigation is presently pending:

- *VoterGa, et al. v. State of Georgia*, No. 2021CV353604 (Fulton Cnty., Ga., Superior Court May 31, 2022) (order granting motion to dismiss), *aff'd*, 368 Ga. App. 119 (2023), *petition for cert. filed*, S23C1132 (Ga. July 13, 2023).

In this case, VoterGA filed a petition for declaratory and injunctive relief against the State regarding the Dominion BMD System, alleging that “although the paper ballot that is generated from the ballot marking devices displays the elector's written intent on the face of the ballot, the elector is unable to verify whether the corresponding QR code on the paper ballot accurately encodes the elector's voting choices” and, consequently, that the Dominion BMDs failed to comply with O.C.G.A. §§ 21-2-2(7.1) and 21-2-300(a)(2). 368 Ga. App. at 120. The trial court granted the State’s motion to dismiss and VoterGA appealed. The Court of Appeals affirmed the trial court’s order, finding the BMDs are compliant with Georgia law. *Id.* at 123. A petition seeking a writ of certiorari from the Georgia Supreme Court was

filed on July 13, 2023, and remains pending. S23C1132. *See also* [Doc. 1682 (Notice of Supplemental Authority)].

- *Thielman v. Fagan*, No. 3:22-cv-01516-SB, 2023 WL 4267434 (D. Ore. June 29, 2023), *appeal docketed*, No. 23-35452 (9th Cir. July 5, 2023). The Thielman plaintiffs filed suit alleging that “Oregon’s computerized vote tabulation and mail-in voting systems violate their constitutional rights, including violations of the Due Process Clause, the Equal Protection Clause, and their fundamental right to vote.” 2023 WL 4267434 at \*1. Plaintiffs sought a judgment declaring that Oregon’s voting systems are unconstitutional and enjoining their use. *Id.* The district court dismissed plaintiffs’ claims for lack of standing and plaintiffs’ appeal remains pending.
- *State of Georgia v. Donald J. Trump, et al.*, No. 23SC188947 (Fulton Cnty., Ga., Superior Court). This criminal case brought by the Fulton County District Attorney is pending in the Fulton County Superior Court. Generally, the indictment alleges that former President Donald J. Trump and eighteen co-defendants joined in a conspiracy to unlawfully change the outcome of the 2020 presidential election. While Defendants dispute the relevance of this criminal prosecution, Plaintiffs have engaged in discovery concerning acts alleged in the indictment as part of the conspiracy. Four co-defendants

have entered negotiated please in the matter, including two whose involvement is seemingly focused on Coffee County—Scott Hall and Sidney Powell.

14.

Attached hereto as **Attachment “A”** is Plaintiffs’ outline of the case which includes a succinct factual summary of Plaintiffs’ cause of action and which shall be neither argumentative nor recite evidence. All relevant rules, regulations, statutes, ordinances, and illustrative case law creating a specific legal duty relied upon by Plaintiffs shall be listed under a separate heading. In negligence cases, each and every act of negligence relied upon shall be separately listed. For each item of damage claimed, Plaintiffs shall separately provide the following information: (a) a brief description of the item claimed, for example, pain and suffering; (b) the dollar amount claimed; and (c) a citation to the law, rule, regulation, or any decision authorizing a recovery for that particular item of damage. Items of damage not identified in this manner shall not be recoverable.

**Plaintiffs’ Statement:** In light of the extensive briefing in this case, and the Court’s recent summary judgment order, Plaintiffs do not believe an outline is necessary or an appropriate use of limited time and resources as the parties prepare for trial. Plaintiffs are happy to submit an outline at the Court’s request.

15.

Attached hereto as **Attachment “B”** is the State Defendants’ outline of the case which includes a succinct factual summary of all general, special, and affirmative defenses relied upon and which shall be neither argumentative nor recite evidence. All relevant rules, regulations, statutes, ordinances, and illustrative case law relied upon as creating a defense shall be listed under a separate heading. For any counterclaim, the State Defendants shall separately provide the following information for each item of damage claimed: (a) a brief description of the item claimed; (b) the dollar amount claimed; and (c) a citation to the law, rule, regulation, or any decision authorizing a recovery for that particular item of damage. Items of damage not identified in this manner shall not be recoverable.

**Defendants’ Statement:** Defendants request to be permitted the opportunity to file a short, concise, outline of the case or otherwise pretrial brief prior to the beginning of trial (*see, infra.*, ¶¶ 21–22). Defendants believe that concise, nonargumentative, statements of law and fact will aid the Court in relating the factual determinations to be resolved at trial with the legal basis for Plaintiffs’ requests for relief. Such practice is also standard procedure for trials in this District and has previously been permitted in the context of other voting rights trials in this District.

16.

The parties submit no stipulated facts at this time, but will continue to meet and confer about potential fact stipulations leading up to trial.

17.

The legal issues to be tried are as follows:

**By Curling Plaintiffs:**

The legal issues to be tried are as follows:

- Count III: Whether Georgia's BMD voting system violates the fundamental right to vote under the Due Process Clause of the 14th Amendment and of 42 U.S.C. § 1983.
- Count IV: Whether Georgia's BMD voting system violates the fundamental right to vote under the Equal Protection Clause of the 14th Amendment and of 42 U.S.C. § 1983.

**By Coalition Plaintiffs:**

The legal issues to be tried are as follows:

- Count I: Whether Georgia's Dominion BMD system burdens Plaintiffs' fundamental right to vote in violation of the First and Fourteenth Amendments.
- Count II: Whether Georgia's Dominion BMD System violates

Plaintiffs' equal protection rights under the Fourteenth Amendment.

**Defendants' Statement:** The legal issues to be tried are as follows:

- Whether Plaintiffs have suffered any particularized, imminent, and concrete injury(ies) so as to confer standing to bring their claims against Defendants, and if so, whether such injury(ies) is/are traceable to and redressable by the Defendants.
- Whether the Coalition for Good Governance has statutory standing to assert a § 1983 action in its own right.
- Whether Plaintiffs' allegations constitute generalized grievances regarding BMD voting systems and election administration and are not actionable burden(s) on the right to vote.
- Curling Plaintiffs' claims:
  - Count III: Whether use of the Dominion BMD System<sup>3</sup> for in-person voting burdens Curling Plaintiffs' fundamental right to vote, contravening the Due Process Clause of the Fourteenth Amendment and, if so, the severity of any such burden.
  - Count IV: Whether use of the Dominion BMD System for in-person voting in Georgia burdens Curling Plaintiffs' fundamental right to vote via unequal and preferential treatment of absentee votes compared to BMD votes, contravening the Equal Protection Clause of the Fourteenth Amendment and, if so, the severity of any such burden.

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<sup>3</sup> For purposes of Curling Plaintiffs' claims, the Dominion BMD System means "[t]he system described in Georgia's contract with Dominion [which] calls for in-precinct scanners/tabulators for 2D barcodes generated by the BMDs." [Doc. 627 at ¶ 71]; *see also id.* at ¶¶ 72–74.

- Coalition Plaintiffs’ claims:
  - Count I: Whether use of the Dominion BMD System<sup>4</sup> for in-person voting in Georgia burdens Coalition Plaintiffs’ fundamental right to vote, contravening the First and Fourteenth Amendments and, if so, the severity of any such burden.
  - Count II: Whether use of the Dominion BMD System for in-person voting in Georgia burdens Coalition Plaintiffs’ fundamental right to vote via unequal and preferential treatment of absentee votes compared to BMD votes, contravening the Equal Protection Clause of the Fourteenth Amendment and, if so, the severity of any such burden.
- Whether Plaintiffs’ allegation that Georgia’s BMD voting system burdens the right to have votes accurately counted as cast identifies an act or policy of Defendants that imposes systemic or otherwise widespread burden(s), or burdens that are of a material character and magnitude on Georgians’ right to vote as established by the First and Fourteenth Amendments to the Constitution of the United States.
- Whether in-person voters using the BMD voting system are deprived of equal protection as compared to voters using absentee paper ballots.
- Whether the harm(s) alleged by Plaintiffs, presuming the harm(s) constitute a burden on the right to vote, have been proximately caused by Defendants under color of state law.
- Whether Defendants’ important regulatory interests or otherwise compelling and tailored interests are sufficient to justify any burden imposed on Georgia voters due to purported vulnerabilities in the current BMD voting system.

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<sup>4</sup> For purposes of Coalition Plaintiffs’ claims, the “Dominion BMD System consists of:” the Democracy Suite Election Management System (“EMS”); EMS adjudication; ICX BMDs; ICP Precinct Scanners; and ICC Central-count scanners. [Doc. 628 at ¶ 67].



- Whether Plaintiffs have adequately shown an available remedy which would ameliorate their alleged harm(s).
- If Plaintiffs successfully demonstrate a burden on their rights to vote which outweighs the Defendants' interests, whether the Plaintiffs will suffer a continuing irreparable injury in the absence of an injunction, the lack of an adequate remedy at law, and whether the equities and public interest support issuance of an injunction.

18.

Attached hereto as **Attachment "C-1"** for the Plaintiffs and **Attachment "C-2"** for the State Defendants is a list of all the witnesses and their addresses for each party. The list must designate the witnesses whom the party will have present at trial and those witnesses whom the party may have present at trial. Expert (any witness who might express an opinion under Rule 702), impeachment and rebuttal witnesses whose use as a witness can be reasonably anticipated must be included. Each party shall also attach to the list a reasonable specific summary of the expected testimony of each expert witness.

All of the other parties may rely upon a representation by a designated party that a witness will be present unless notice to the contrary is given ten (10) days prior to trial to allow the other party(s) to subpoena the witness or to obtain the witness' testimony by other means. Witnesses who are not included on the witness list (including expert, impeachment and rebuttal witnesses whose use should have been reasonably anticipated) will not be permitted to testify, unless expressly

authorized by court order based upon a showing that the failure to comply was justified.

**Plaintiffs' Statement:**

- For the sake of judicial economy and to reduce the burden on witnesses, Plaintiffs propose that **each witness will be called to the stand to testify only once, except for (i) any witness Plaintiffs recall for rebuttal purposes; and (ii) any witness Defendants need to recall in their case-in-chief due to unforeseeable developments in the trial after the witness testified.** If the parties identify the same witness, Defendants will conduct their full examination of the witness when Plaintiffs call them (as opposed to recalling them and needlessly burdening the witness); thus, any examination by Defendants of any such witness will not be limited to the scope of any initial examination by Plaintiffs (any subsequent examination of any such witness by either side will be limited to the scope of the preceding examination by the other side).
- Plaintiffs further propose that the offering party **provide notice of the witnesses it intends to call to the stand no later than 6:00pm ET two business days before calling the witness,** and that the witnesses identified be limited only to those specific witnesses the sponsoring party or parties

realistically and in good faith intend to call at trial on any given trial day. Plaintiffs propose that the parties may change, forgo, or waive this deadline only upon mutual written agreement of all parties and that the parties will be barred from calling a witness not timely disclosed by this deadline absent unforeseeable circumstances. Relying on “good faith” alone rather than binding disclosure requirements and deadlines unfortunately is insufficient to ensure that Defendants do not adopt trial-by-ambush as a litigation strategy, as their pretrial submissions and the parties’ meet-and-confers have indicated they seek to do. Defendants have provided a long witness list with an unrealistic number of “may call” witnesses, including witnesses not disclosed or identified timely, or at all, in discovery. Absent substantial narrowing of that list *and* reasonable notice of the witnesses Defendants realistically and in good faith intend to call on any given trial day at least two business days before they are expected to testify, Plaintiffs would incur the enormous and highly prejudicial expense, burden, and distraction of preparing cross examination outlines and exhibits for numerous witnesses with little notice, many of whom might not ever testify at all.

Finally, Plaintiffs propose that properly disclosed experts who are expected to testify at trial not be sequestered during trial so that they can observe the

proceedings in full, as is standard in federal courts. The showing necessary for the inclusion of an expert under the exception to the general sequestration rule in Fed. R. Evid. 615 has been held to be a minor burden. *Morvant v. Construction Aggregates Corp.*, 570 F.2d 626, 630 (6th Cir. 1978) (trial court bound to accept any reasonable, substantiated representation); *T.J. Stevenson & Co. v. 81, 193 Bags of Flour*, 629 F.2d 338, 384 (5th Cir. 1980) (trial court “probably required” to permit presence of expert). Indeed, the Advisory Committee specifically noted that the third exception—regarding individuals whose “presence shows to be essential to presenting the party’s claim or defense”—contemplates “an expert needed to advise counsel in the management of the litigation.” Fed. R. Evid. 615, Advisory Committee Notes, 1972 Proposed Rules. The complexity of the case, vastness of the record, and technical nature of Plaintiffs’ claims require comprehensive expert testimony at trial. That need is best served by allowing the experts to observe the proceedings in full.

**Defendants’ Statement:**

- Defendants submit that there is no reason to vary from the normal practice in this district of each side putting up its case. Plaintiffs’ proposal would further restrict Defendants’ ability to move under Rule 52(c) for judgment at the close of Plaintiffs’ evidence. This is not a preliminary-injunction

proceeding. This is a trial and Defendants are entitled to put on *their* case at trial, which should proceed in accordance with the rules. Defendants are willing to disclose witnesses in advance to ensure the trial moves smoothly, as has been done in other election cases before this district.

- Defendants request that witnesses other than parties are sequestered during trial pursuant to Fed. R. Evid. 615. Rule 615 requires that, upon a party's request, "the court **must** order witnesses excluded so that they cannot hear other witnesses' testimony." Fed. R. Evid. 615 (emphasis added). An opposing party may overcome this request by that party showing the witness's presence is "essential to presenting the party's claim or defense." *Id.* at (c) (emphasis added). Mere convenience is not a reason to except a witness from sequestration under Fed. R. Evid. 615, and Plaintiffs do not contend, as is required by Fed. R. Evid. 615(c), that their experts' presence is essential to their case. Defendants are willing to discuss, in good faith, exceptions to Fed. R. Evid. 615 for Plaintiffs' experts provided that Plaintiffs can explain their reasoning.

19.

Attached hereto as **Attachment "D-1"** for the Curling Plaintiffs, **Attachment "D-2"** for the Coalition Plaintiffs, and **Attachment "D-3"** for the

State Defendants are the typed lists of all documentary and physical evidence that will be tendered at trial. Learned treatises which are expected to be used at trial shall not be admitted as exhibits. Counsel are required, however, to identify all such treatises under a separate heading on the party's exhibit list.

Each party's exhibits shall be numbered serially, beginning with 1, and without the inclusion of any alphabetical or numerical subparts. Adequate space must be left on the left margin of each party's exhibit list for court stamping purposes. A courtesy copy of each party's list must be submitted for use by the judge.

Prior to trial, counsel shall mark the exhibits as numbered on the attached lists by affixing numbered yellow stickers to Plaintiffs' exhibits, numbered blue stickers to State Defendants' exhibits, and numbered white stickers to joint exhibits. When there are multiple plaintiffs or defendants, the surname of the particular plaintiff or defendant shall be shown above the number on the stickers for that party's exhibits.

Specific objections to another party's exhibits must be typed on a separate page and must be attached to the exhibit list of the party against whom the objections are raised. Objections as to authenticity, privilege, competency, and, to the extent possible, relevancy of the exhibits shall be included. Any listed

document to which an objection is not raised shall be deemed to have been stipulated as to authenticity by the parties and shall be admitted at trial without further proof of authenticity.

Unless otherwise noted, copies rather than originals of documentary evidence may be used at trial. Documentary or physical exhibits may not be submitted by counsel after filing of the pretrial order, except upon consent of all the parties or permission of the court. Exhibits so admitted must be numbered, inspected by counsel, and marked with stickers prior to trial.

Counsel shall familiarize themselves with all exhibits (and the numbering thereof) prior to trial. Counsel will not be afforded time during trial to examine exhibits that are or should have been listed.

**Plaintiffs' Statement:** To promote judicial economy, Plaintiffs propose the following disclosure schedule for exhibits parties intend to offer at trial:

- **No later than 6:00pm ET two business days before the offering party intends to offer any exhibit on direct examination**, the offering party shall disclose the exhibits it intends to offer for each such examination, including (i) the corresponding exhibit number from the sponsoring party's exhibit list for each such exhibit and (ii) the full name of the sponsoring witness (from the sponsoring party's witness list) with whom each such exhibit will be

offered at trial.

- **No later than 6:00pm ET one business day before the offering party intends to offer any disclosed exhibit**, the non-offering party must disclose all objections to those exhibits, except for any unforeseeable objections that arise upon the use or introduction of the exhibits at trial. Such objections shall be limited only to those specific objections on which the objecting party or parties actually intend to seek a ruling from the Court for trial.
- **At 7:30pm ET the evening prior to each trial day**, the parties shall meet and confer concerning the exhibits intended to be offered at trial the next day and any other issue appropriate for such a meet-and-confer. The parties agree to inform the Court of any outstanding disputes regarding exhibits, designations, counter designations, demonstratives, or any other issue prior to the start of trial each day. The parties agree to meet and confer in good faith to avoid raising any issue with the Court—absent unforeseeable circumstances—without first conferring with the other side on it not later than the parties’ regularly-scheduled meet-and-confer the evening before.
- In order to ensure that the parties in fact follow these disclosure rules and do not resort to trial-by-ambush, Plaintiffs propose that the parties may change, forgo, or waive any of these disclosure deadlines only upon mutual written



agreement of all parties or by order of the court on a showing of good cause.

**Defendants' Statement:** Defendants reserve the right to supplement or amend their exhibit list as necessary in light of the outstanding discovery in this case. In order to promote judicial economy, Defendants propose the following disclosure schedule for exhibits parties intend to offer at trial, and further notes that the processes outlined by Plaintiffs and Defendants would necessitate the separate presentation of evidence, because they are triggered by direct examination. Only Defendants' proposal ensures the trial runs in an orderly fashion by making clear when direct examination of each witness takes place:

- **No later than 6:00pm ET one business days before the offering party intends to offer any exhibit on direct examination,** the offering party shall disclose the exhibits it intends to offer for each such examination, including (i) the corresponding exhibit number from the sponsoring party's exhibit list for each such exhibit and (ii) the full name of the sponsoring witness (from the sponsoring party's witness list) with whom each such exhibit will be offered at trial.
- The parties shall meet and confer as necessary concerning the exhibits intended to be offered at trial and any other issue appropriate for such a meet-and-confer. The parties agree to inform the Court of any outstanding

disputes regarding exhibits, designations, counter designations, demonstratives, or any other issue prior to the start of trial each day. The parties agree to meet and confer in good faith to avoid raising any issue with the Court—absent unforeseeable circumstances—without first conferring with the other side on it not later than the parties’ regularly-scheduled meet-and-confer the evening before.

**Plaintiffs’ and Defendants’ Statement:** The parties agree to the authenticity of the top email in a thread, *i.e.* most recent, (1) sent from an @sos.ga.gov email address, and (2) which bear a Defendants’ Bates stamp. Notwithstanding the parties’ agreement as to authenticity of such documents, a party using any such document as an exhibit is still required to disclose such document in accordance with the disclosure schedule adopted by the Court. This is not an agreement to the admissibility of exhibits at trial, and the parties do not waive any objections to such exhibits.

20.

Attached hereto as **Attachment “E-1”** for the Plaintiffs and **Attachment “E-2”** for the Defendants are the designations, counter-designations, and objections to the testimony of the witnesses which may be introduced by deposition.

**Plaintiffs’ and Defendants’ Statement:** In order to promote judicial economy, the parties propose that, in lieu of playing any deposition designation live in Court, a party may choose to submit any designation to the Court (upon resolution of any evidentiary objections to any such designation) as both an excerpted transcript and a corresponding excerpted video file, if a video file exists; the court then could review the video at its convenience rather than consume trial hours for that.

**Plaintiffs’ Statement:** For the sake of judicial economy, Plaintiffs propose the following disclosure schedule for deposition testimony parties intend to offer at trial:

- **No later than 6:00pm ET two business days before the offering party intends to offer any designated testimony**, the offering party shall disclose the designated testimony it intends to offer; these shall be limited only to those specific designations the sponsoring party or parties actually intend to offer at trial.
- **No later than 6:00pm ET one business day before the offering party intends to offer any designated testimony**, the non-offering party must disclose all objections and counter-designations to that testimony; these shall be limited only to those specific (i) counter-designations the sponsoring party or parties actually intend to offer at trial and (ii) objection on which the

objecting party actually intends to seek a ruling from the Court for trial.

- **At 7:30pm ET the evening prior to each trial day**, the parties shall meet and confer concerning the designations and counter designations intended to be offered at trial the next day and any other issue appropriate for such a meet-and-confer. The parties agree to inform the Court of any outstanding disputes regarding exhibits, designations, counter designations, demonstratives, or any other issue prior to the start of trial each day. The parties agree to meet and confer in good faith to avoid raising any issue with the Court—absent unforeseeable circumstances—without first conferring with the other side on it not later than the parties’ regularly-scheduled meet-and-confer the evening before.

In order to ensure that the parties in fact follow these disclosure rules and do not resort to trial by ambush, Plaintiffs further propose that the parties may change, forgo, or waive any of these disclosure deadlines only upon mutual written agreement of all parties or by order of the court on a showing of good cause.

**Defendants’ Statement:** Defendants disagree with Plaintiffs’ proposal regarding waiving the disclosure deadlines only by mutual written agreement or order of the court. Defendants propose that the parties make a good faith effort to meet the disclosure deadlines, and in the event a deadline cannot be met, the deadline may

be waived with notice to the opposing party and an explanation of the good faith attempt to meet the deadline.

21.

**Plaintiffs' Statement:** In light of the extensive briefing in this case, and the Court's recent summary judgment order, Plaintiffs do not believe trial briefs are necessary or an appropriate use of limited time and resources as the parties prepare for trial.

**Defendants' Statement:** In light of the complexity of the issues involved in this case, Defendants believe a trial brief containing citations to legal authority concerning evidentiary questions and any other legal issues which counsel anticipate will arise during the trial of the case would assist the Court as to such issues should they arise and promote a clear record in the case. Defendants propose that trial briefs be due seven (7) days after the Court enters the pre-trial order.

22.

Because this case will not be tried to a jury, the parties do not intend to submit requests for charge.

23.

Because this case will not be tried to a jury, the parties are not proposing a special verdict form.

24.

Unless otherwise authorized by the court, arguments in all jury cases shall be limited to one-half hour for each side. Should any party desire any additional time for argument, the request should be noted (and explained) herein.

**Plaintiffs' and Defendants' Statement:** The parties agree that the complexity of the issues involved in this case, combined with the novel legal theories at issue, warrant extending the typical time for opening and closing argument. The parties propose extending the time for opening argument from thirty (30) minutes per side to sixty (60) minutes per side. The parties agree to equal time limits for closing arguments for each side, but propose that the parties wait to meet and confer to agree on a time limit for closing arguments as trial progresses.

25.

If the case is designated for trial to the court without a jury, counsel are directed to submit proposed finding of fact and conclusions of law.

**Plaintiffs' and Defendants' Statement:** The parties request that proposed findings of fact and conclusions of law be submitted at a date specified by the Court after the conclusion of trial to allow for citation to admitted evidence and testimony.

26.

Pursuant to LR 16.3, lead counsel and persons possessing settlement authority to bind the parties met in person on the following dates: August 10-11, 2023, to discuss in good faith the possibility of settlement of this case. The parties are planning to discuss settlement further on December 13, 2023. The Court has discussed settlement of this case with counsel. It appears at this time that there is little possibility of settlement.

27.

Plaintiffs estimate that they will require 5-8 full days to present their evidence. Defendants estimate that they will require three days to present their evidence. It is estimated that the total trial time is no more than 12 full days, with the trial to be completed by January 24, 2024. But the parties request that the Court continue to hold its schedule open through January 31, 2024, in case additional time is needed to complete the trial in January rather than risk the need to pause and resume later.

**Plaintiffs' Statement:** Plaintiffs propose that the parties split the total trial time allotted by the Court evenly between Plaintiffs and Defendants. Plaintiffs further propose that each side's own examinations come out of their total time regardless of whether those occur during their own case or that of the other side. Either the Court or the parties will be responsible for carefully tracking and recording the

time used by each side each day, and there shall be no additional time given to either side absent unforeseeable and uncontrollable circumstances. This is standard practice in trials across the country and ensures efficient, prompt, timely completion of trial in accordance with Rule 1 of the Federal Rules of Procedure. There is nothing unique or unusual about this case that warrants departing from this standard, important practice, and doing so inevitably will cause the trial to take longer than needed, thereby wasting limited judicial and party resources and delaying resolution of this case on the merits. Plaintiffs believe that this trial can—and must—be completed by the end of January 2024 barring unforeseeable circumstances beyond the control of the parties or the court.

**Defendants' Statement:** Defendants disagree that the parties be allowed to split the total trial time allotted by the Court evenly. Due to the complexity of the issues involved in this case, combined with the novel legal theories at issue, Defendants propose that each party be allowed what time they require to present their case, without the inclusion of a clock to track the time. Defendants have been parties in other election cases in the Northern District of Georgia that have gone to trial, and each party was allowed the time they required to present their case without a clock or a requirement to split time evenly.



IT IS HEREBY ORDERED that the above constitutes the pretrial order for the above captioned case submitted by stipulation of the parties or approved by the Court after conference with the parties.

IT IS FURTHER ORDERED that the foregoing, including the attachments thereto, constitutes the pretrial order in the above captioned case and that it supersedes the pleading which are hereby amended to conform hereto and that this pretrial order shall not be amended except by Order of the Court to prevent manifest injustice. Any attempt to reserve a right to amend or add to any part of the pretrial order after the pretrial order has been filed shall be invalid and of no effect and shall not be binding upon any party or the court, unless specifically authorized in writing by the court.

**IT IS SO ORDERED** this \_\_\_\_\_ day of December, 2023.

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The Hon. Amy Totenberg  
Judge, United States District Court

Each of the undersigned counsel for the parties hereby consents to entry of the foregoing pretrial order, which has been prepared in accordance with the form pretrial order adopted by this Court.

Respectfully submitted this 11th day of December, 2023.

**/s/ David D. Cross**

David D. Cross (*pro hac vice*)  
Mary G. Kaiser (*pro hac vice*)  
Matthaeus Martino-Weinhardt  
(*pro hac vice*)  
Ramsey Fisher (*pro hac vice*)  
Aaron Scheinman (*pro hac vice*)  
Benjamin Campbell (*pro hac vice*)  
Wail Jihadi (*pro hac vice*)  
Oluwasegun Joseph (*pro hac vice*)  
MORRISON & FOERSTER LLP  
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**/s/ Halsey G. Knapp, Jr.**

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Adam M. Sparks  
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**/s/ Christian G. Andreu-von Euw**

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Christian G. Andreu-von Euw  
(*pro hac vice*)  
THE BUSINESS LITIGATION GROUP,  
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*Counsel for Plaintiffs Donna Curling, Donna Price & Jeffrey Schoenberg*

/s/ Bruce P. Brown

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/s/ Robert A. McGuire, III

Robert A. McGuire, III  
Admitted Pro Hac Vice  
(ECF No. 125)  
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/s/ Russell T. Abney

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Georgia Bar No. 000875  
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*Counsel for Plaintiff Coalition for Good Governance*

/s/ Cary Ichter

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*Counsel for Plaintiffs William Digges III, Laura Digges,  
& Megan Missett*

/s/ Vincent Russo

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/s/ Bryan P. Tyson

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Telephone: 678-336-7249

*Counsel for Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Adam M. Sparks  
Adam M. Sparks

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 11, 2023, a copy of the foregoing **PROPOSED PRETRIAL ORDER** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Adam M. Sparks  
Adam M. Sparks

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

**DONNA CURLING, ET AL.,**  
**Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,**  
**Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**ATTACHMENT C-1:**  
**PLAINTIFFS' JOINT WITNESS LIST**

Plaintiffs identify herein the individual witnesses they will and/or may call for this lawsuit. Plaintiffs reserve the right to modify or supplement this list with reasonable notice to counsel.

NAME	ADDRESS	Status
<b>Dr. Alex Halderman</b> <i>A summary of Dr. Halderman's opinions are found in his declarations, deposition and hearing testimony, and expert reports [e.g., Dkts. 1681, 1304-3, 1635-19, 1635-38].</i>	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call

NAME	ADDRESS	Status
<b>Donna Curling</b>	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call
<b>Donna Price</b>	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call
<b>Jeffrey Schoenberg</b>	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call
<b>Kevin Skoglund</b> <i>A summary of Dr. Skoglund's opinions are found in his declarations, deposition and hearing testimony, and expert reports [e.g., Dkts. 640-1, 923-3, 943, 1439, 1635-44].</i>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
<b>Philip Stark</b> <i>A summary of Dr. Stark's opinions are found in his declarations, deposition and hearing testimony, and expert reports [e.g., Dkts. 296, 327-1, 640-1, 680-1, 809-2, 835-1, 891, 1145, 1633-21].</i>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call



NAME	ADDRESS	Status
<b>Marilyn Marks</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
<b>Megan Missett</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
<b>Laura Digges</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
<b>William Digges III</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
<b>Richard DeMillo</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
<b>Brad Raffensperger</b>	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	Will call
<b>Dr. Andrew Appel</b> <i>A summary of Dr. Appel's opinions are found in his declarations, deposition testimony, and expert reports [e.g., Dkt. 1569-59, 1304-4].</i>	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call

NAME	ADDRESS	Status
<b>Merritt Beaver</b>	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	Will call
<b>Gabriel Sterling</b>	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	Will call
<b>Michael Barnes</b>	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	Will call
<b>Wenke Lee</b>	School of Computer Science Georgia Institute of Technology 266 Ferst Dr Atlanta, Georgia 30331	Will call
<b>Ed Lindsey</b>	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	Will call
<b>Frances Watson</b>	Georgia Department of Revenue 1800 Century Blvd NE Atlanta, Georgia 30345	Will call
<b>C. Ryan Germany</b>	Gilbert, Harrell, Sumerford & Martin, PC 675 Ponce de Leon Ave NE Atlanta, Georgia 30308	Will call
<b>Paul Maggio</b>	SullivanStrickler LLC 2660 Peachtree Road NW #13A, Atlanta, Georgia 30305	Will call
<b>Dr. Juan Gilbert</b>	Computer & Information Science & Engineering Department University of Florida 1889 Museum Rd. Gainesville, FL 32611	May Call

NAME	ADDRESS	Status
<b>Dr. Benjamin Adida</b>	VotingWorks 548 Market St., Ste. 53001 San Francisco, CA 94104	May Call
<b>Chris Harvey</b>	Georgia Peace Officers Standards and Training Council 5000 Austell-Powder Springs Road, Suite 280 Austell, Georgia 30106	May call
<b>Jeanne Dufort</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call
<b>Aileen Nakamura</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call
<b>Joy Wasson</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call
<b>Rhonda Martin</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call
<b>Virginia Forney</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call

NAME	ADDRESS	Status
<b>Richard Barron</b>	480 John Wesley Dobbs Ave NE Unit 304 Atlanta, Georgia 30312	May call
<b>Greg Freemeyer</b>	SullivanStrickler LLC 2660 Peachtree Road NW #13A, Atlanta, Georgia 30305	May call
<b>Dean Felicetti</b>	SullivanStrickler LLC 2660 Peachtree Road NW #13A, Atlanta, Georgia 30305	May call
<b>David Hamilton</b>	4570 Summerwood Dr. Cumming, Georgia 30041	May call
<b>Joshua Blanchard</b>	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	May call
<b>Robert Sinners</b>	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	May call
<b>Mathew Mashburn</b>	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	May call
<b>Sara Ghazal</b>	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	May call
<b>Dr. Janice Johnston</b>	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	May call
<b>Rebecca Sullivan</b>	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	May call

EXHIBIT 5

NAME	ADDRESS	Status
Any witness identified by any Defendant	N/A	May call

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**ATTACHMENT C-2:**  
**DEFENDANTS' WITNESS LIST**

Defendants identify herein the individual witnesses they will and/or may call for this lawsuit. Defendants reserve the right to modify or supplement this list of witnesses based on further discovery of information and the pretrial proceedings in this lawsuit. Defendants further reserve the right to supplement this list with reasonable notice to counsel.

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
<b>Dr. Ben Adida</b> <i>A summary of Dr. Adida's opinions are found in his declarations and hearing testimony.</i>	Please contact through counsel.	Audits; rebuttal expert testimony	Will call
<b>Michael Barnes</b>	Please contact through counsel.	Georgia election system and security; implementation of updates to Dominion BMD system; the BMD voting experience	Will call
<b>Dr. Juan Gilbert</b> <i>A summary of Dr. Gilbert's opinions are found in his declarations, and deposition and hearing testimony.</i>	Please contact through counsel.	Election security; BMD voting systems; HMPBs; audits; rebuttal expert testimony	Will call
<b>Gabriel Sterling</b>	Please contact through counsel.	Allegations and relief sought in this action; audits; procurement and implementation of Dominion BMD system and updates to the Georgia voting system; physical; CISA; Ballot secrecy; recommended layout of voting machines; implementation of Plaintiffs' requested relief	Will call

<b>Proposed Witness</b>	<b>Address</b>	<b>Anticipated Subjects of Testimony</b>	<b>Status</b>
<b>Merritt Beaver</b>	Please contact through counsel.	IT security; Fortalice assessments	May call
<b>Chris Bellew</b>	Please contact through counsel.	Georgia election system and security; implementation of updates to Dominion BMD system; the BMD voting experience	May call
<b>Matthew D. Bernhard</b>	2260 Hayward Street Ann Arbor, Michigan 48109	Enhanced Voting	May call
<b>Nancy Boren</b>	Attn: Elections & Registration Office P.O. Box 1340 Colombus, Georgia 31902	Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; audits; implementation of the relief Plaintiffs seek	May call
<b>Eric Chaney (or Coffee County Elections Board Representative)</b>	Coffee County Elections & Registration Office 224 W Ashley Street, Douglas, Georgia 31533	Coffee County	May call
<b>Coalition for Good Governance Corporate Representative</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown	Allegations, claims, and relief sought in this action	May call



<b>Proposed Witness</b>	<b>Address</b>	<b>Anticipated Subjects of Testimony</b>	<b>Status</b>
	1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700		
<b>Jack Cobb</b>	Pro V&V 6705 Odyssey Drive, Suite C Huntsville, Alabama 35806	Voting system certification; review of voting equipment	May call
<b>Benjamin Cotton</b>	27427 Montana Highway 83, Bigfork, Montana 59911	Coffee County and work with VoterGA	May call
<b>Alex Cruce</b>	Attn: Courtney Kramer Binnall Law Group 717 King Street, Suite 200 Alexandria, Virginia 22314	Coffee County; ballot secrecy; efforts to investigate security and accuracy of Georgia election system; communications with Marilyn Marks	May call
<b>Donna Curling</b>	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofocom	Allegations, claims, and relief sought in this action	May call
<b>Ricardo Davis</b>	Ichter Davis LLC Attn: Cary Ichter 3340 Peachtree Road NE, Suite 1530	Allegations, claims, and relief sought in this action	May call

<b>Proposed Witness</b>	<b>Address</b>	<b>Anticipated Subjects of Testimony</b>	<b>Status</b>
	Atlanta, Georgia 30326		
<b>Laura Digges</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call
<b>William Digges III</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call
<b>Nick Ikonomakis - Dominion Corporate Representative</b>	Attn: J. Matthew Maguire, Jr. 1355 Peachtree St NE #2000 Atlanta, Georgia 30309	Dominion BMD voting system security; Dominion Democracy Suite version 5.17	May call
<b>James Elliott</b>	577 Mulberry Street, Suite 1225 Macon, Georgia 31201	Municipal election administration in Georgia	May call
<b>Joseph Blake Evans</b>	Please contact through counsel.	Secretary of State election administration issues; recommended layout of voting	May call

<b>Proposed Witness</b>	<b>Address</b>	<b>Anticipated Subjects of Testimony</b>	<b>Status</b>
		machines; implementation of relief	
<b>Ryan Germany</b>	Gilbert, Harrell, Sumerford & Martin, PC 675 Ponce de Leon Ave NE Atlanta, Georgia 30308	Ballot secrecy; election administration issues	May call
<b>Scott Hall</b>	Attn: Lynsey Barron Barron Law 1800 Peachtree St. NE, Suite 300 Atlanta, Georgia 30309	Coffee County; efforts to investigate security and accuracy of Georgia election system; communications with Marilyn Marks	May call
<b>Misty Hampton</b>	830 Dennis Harper Road Ambrose, Georgia 31512	Coffee County	May call
<b>Chris Harvey</b>	Georgia Peace Officers Standards and Training Council 5000 Austell- Powder Springs Road, Suite 280 Austell, Georgia 30106	Ballot secrecy; recommended layout of voting machines; election administration	May call
<b>Joseph Kirk</b>	Bartow County Elections Office 1300 Joe Frank Harris Pkwy., Cartersville, Georgia 30120	Elections Administration; Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment;	May call

<b>Proposed Witness</b>	<b>Address</b>	<b>Anticipated Subjects of Testimony</b>	<b>Status</b>
		audits; implementation of the relief Plaintiffs seek	
<b>Cathleen Latham</b>	95 Banklodge Drive, Douglas, Georgia 31535	Coffee County	May call
<b>Lynn Ledford</b>	Gwinnett County Voter Registration and Elections 455 Grayson Highway, Suite 200 Lawrenceville, GA 30046 678.226.7210	County elections administration; balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; implementation of the relief Plaintiffs seek	May call
<b>Richard Lysinger</b>	Please contact through counsel.	Secretary of State IT	May call
<b>Marilyn Marks</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action; Coffee County	May call
<b>Matthew Mashburn</b>	Please contact through counsel.	SEB regulations regarding election security and handling of equipment; SEB authority	May call

<b>Proposed Witness</b>	<b>Address</b>	<b>Anticipated Subjects of Testimony</b>	<b>Status</b>
<b>Megan Missett</b>	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call
<b>Theresa Payton</b>	Attn: James E. Connelly 271 17 <sup>th</sup> Street, N.W. Atlanta, Georgia 30363	IT and cyber security	May call
<b>James Persinger</b>	Please contact through counsel.	IT and cyber security; Coffee County equipment	May call
<b>Donna Price</b>	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Allegations, claims, and relief sought in this action	May call
<b>Secretary of State Brad Raffensperger</b>	Please contact through counsel.	Allegations and relief sought in this action	May call
<b>Jil Ridlehoover</b>	50 Maplewood Road, Douglas, Georgia 31535	Coffee County	May call

<b>Proposed Witness</b>	<b>Address</b>	<b>Anticipated Subjects of Testimony</b>	<b>Status</b>
<b>Jeffrey Schoenberg</b>	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Allegations, claims, and relief sought in this action	May call
<b>Blake Voyles</b>	309 North Gaskin Avenue, Douglas, Georgia 31533	Coffee County	May call
<b>Nick Whitney</b>	6303 Cowboys Way Frisco, Texas 75034	GARViS	May call
<b>Any witness identified by any Plaintiff</b>	N/A	N/A	May Call

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**ATTACHMENT D-1:**  
**CURLING PLAINTIFFS' EXHIBIT LIST AND**  
**STATE DEFENDANTS' OBJECTIONS THERETO**

State Defendants identify herein their objections to the potential trial exhibits Plaintiffs have jointly identified for this lawsuit. State Defendants reserve the right to modify or supplement this list of objections based on further discovery of information and the pretrial proceedings in this lawsuit. State Defendants further reserve the right to supplement this list of objections with reasonable notice to counsel.

PX No.	Document Description	Citation
1	Harri Hursti, <i>Diebold TSx Evaluation, Security Alert - May 11, 2006, Critical Security Issues with Diebold TSx</i> , BlackBoxVoting.org (May 11, 2006)	Dkt. 1628-6
2	Ariel J. Feldman, J. Alex Halderman, & Edward W. Felten, “Security Analysis of the Diebold AccuVote-TS Voting Machine,” in Proc. USENIX/ACCURATE Electronic Voting Technology Workshop (2007)	Dkt. 1628-8
3	Electronic Voting System Security: Hearing Before the H. Comm. on House Admin., 108th Cong. 99-113, at 107-09 (2004) (statement of Kathy Rogers, Ga. Dir. of Election Admin)	Dkt. 1628-9
4	Presentation titled “The Georgia Voting System,” presented by Merle S. King, Kennesaw State University, Center for Election Systems, dated February 2014	Dkt. 1628-12
5	STATE-DEFENDANTS-00000409	Dkt. 1628-16
6	FOIA Aug. 29, 2016 Email Chain	Dkt. 1628-17
7	FOIA Mar. 16-17, 2017 Email Chains	Dkt. 1628-19
8	FedEx Notice of Complaint	Dkt. 548 at PDF pp. 30-31
9	FOIA July 7, 2017 Email Chain	Dkt. 1628-21
10	Notice of Removal	Dkt. 1
11	FOIA Aug. 9, 2017 Email Chain	Dkt. 1628-23
12	State Defs' Response re Spoliation of Evidence	Dkt. 558
13	Frank Bajak, <i>Georgia election server wiped after suit filed</i> , AP News (Oct. 26, 2017)	Dkt. 1628-25
14	Jan. 8, 2020 Decl. of J. Alex Halderman, Ph.D. with Appx. A: Matthew Bernhard et al., <i>Can Voters Detect Malicious Manipulation of Ballot Marking Devices?</i> , Univ. of Mich. (2020)	Dkt. 692-3
15	Ledford Dep. Ex. 6 – KSU CES Instructions re GEMS	Dkt. 471-6 Ledford Dep. Ex. 6



PX No.	Document Description	Citation
16	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 1 - 2022.10.10 Joint Pls.' 7th Am. 30b6 Deposition Notice to Ga. Sec'y of State's Office	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 1
17	Ex. C - Feb 2018 Fortalice Report	Dkt. 510-7 PX02 (July 2019 PI Hearing)
18	Ex. A - Oct 2017 Fortalice Report	Dkt. 510-5 (PX01 (July 2019 PI Hearing)
19	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 3 - FORTALICE003692 (Aug. 25, 2020 Draft Technical Assessment (13 pgs))	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 3
20	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 14 - STATE-DEFENDANTS- 00126614	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 14 Hamilton Dep. Ex. 17
21	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 15 - STATE-DEFENDANTS- 00126678	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 15 Hamilton Dep. Ex. 8
22	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 17 - STATE-DEFENDANTS- 00182161	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 17
23	July 30, 2019 State Defs.' Response to Court Questions	Dkt. 556
24	Oct. 25, 2019 Brief ISO State Defs.' Motion to Dismiss	Dkt. 645-1

PX No.	Document Description	Citation
25	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 18 - STATE-DEFENDANTS- 00182171 (2020 Rule 590-8.3 Attestation)	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 18 Hamilton Dep. Ex. 23
26	Nov. 23, 2021 State Defs.' Responses to Curling Pls.' Requests for Admission (Response No. 65)	(full version at Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 7
27	Ledford Dep. Ex. 7	Dkt. 471-7 Ledford Dep. Ex. 7
28	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 16 STATE-DEFENDANTS- 00153091	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 16
29	Dominion027284	Dkt. 1630-8
30	STATE-DEFENDANTS-00101382	Dkt. 1630-10
31	STATE-DEFENDANTS-00158640	Dkt. 1630-11
32	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 29 - STATE-DEFENDANTS- 00158823	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 29
33	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 4 - Dominion001889	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 4 PX37 (Sept. 2020 PI Hearing) Gilbert Dep. Ex. 6

PX No.	Document Description	Citation
34	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 12 - STATE- DEFENDANTS-00124842	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 12
35	Hamilton Dep. Ex. 18 - FORTALICE001163	Hamilton Dep. Ex. 18
36	Hamilton Dep. Ex. 14 - STATE-DEFENDANTS-00171971	Hamilton Dep. Ex. 14
37	Hampton Dep. Ex. 22 (still shots captured from Misty Hampton YouTube video)	Hampton Dep. Ex. 22
38	Hampton Dep. Ex. 23 (image from the Coffee County Elections Office produced by Paul Maggio)	Hampton Dep. Ex. 23
39	Hampton Dep. Ex. 24 (still shot of password on paper placed on a desktop computer)	Hampton Dep. Ex. 24
40	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 2 (Sept. 28, 2021 report of Coffee County investigation)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 2
41	Ex. A to Plaintiffs' Joint Notice of Filing Additional Evidence in Support of Renewed Motions for Attorneys' Fees and Expenses	Dkt. 1551-1
42	Rev.com, Inc., <i>Georgia Secretary of State Brad Raffensperger Press Conference Transcript: Announces Hand Recount</i> (Nov. 11, 2020)	Dkt. 1630-28
43	Jan. 10, 2019 Secure, Accessible & Fair Elections (SAFE) Commission Report, submitted to the Ga. General Assembly	Dkt. 1630-29

PX No.	Document Description	Citation
44	Aug. 28, 2019 Joint Discovery Statement Regarding Production of FBI Server Image	Dkt. 589
45	Ga. Sec’y of State, <i>Security-Focused Tech Company, Dominion Voting to Implement new Verified Paper Ballot System</i> (July 29, 2019)	Dkt. 1630-32
46	Intentionally Left Blank	
47	Dominion Contract (Cross Decl. Ex. 2 ISO Curling Plaintiffs’ Motion for Preliminary Injunction)	Dkt. 619-8
48	Oct. 12, 2022 SOS 30b6 Sterling Dep. Ex. 4 (tweet by Gabriel Sterling)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 4
49	Wenke Lee Article (Jan. 3, 2019)	Dkt. 615-3
50	Richard A. DeMillo, Robert S. Kadel & Marilyn R. Marks, <i>What Voters are Asked to Verify Affects Ballot Verification: A Quantitative Analysis of Voters’ Memories of Their Ballots</i> (Apr. 11, 2019)	Dkt. 1630-44
51	Gilbert Dep. Ex. 2 - University of Georgia School of Public & International Affairs, <i>Georgia Voter Verification Study</i> (Jan. 22, 2021)	Gilbert Dep. Ex. 2
52	Jan. 7, 2019 Experts Letter to SAFE Commission	Dkt. 419-1
53	ELECTIONS 00000143	Dkt. 1630-48
54	July 1, 2021 Coalition Plaintiff’s Expert Disclosures – Opening Reports, along with excerpt of Supplemental Decl. of Harri Hursti, dated Sept. 1, 2020, and excerpt of Decl. of Philip B. Stark, dated Sept. 9, 2018	Dkt. 1278-1
55	Ben Adida Twitter (Oct. 1, 2022) (“my ideal voting model is one where voters get to choose BMD or hand marked”)	Dkt. 1630-50
56	Ben Adida Twitter (Feb. 20, 2020) (“RLAs never confirm outcomes on their own”)	Dkt. 1631-1

PX No.	Document Description	Citation
57	Verified Voting's Election Day Equipment map, Verified Voting, <i>Election Day Equipment</i> (Data from November 2022)	Dkt. 1631-2
58	Written Testimony of Marian K. Schneider, President of Verified Voting, to Allegheny Cnty. Bd. of Elections, Public Meeting on Purchase of Voting Systems (June 7, 2019)	Dkt. 1631-4
59	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 21 - Dominion044536	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 21
60	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 9 - STATE-DEFENDANTS-00172679 (Email re issues with Fulton County Batch Tally Sheets)	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 9
61	Jan. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 23 - Nov. 17, 2021 Kemp Ltr to SEB re 2020 RLA Report	Jan. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 23
62	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 15 – Dominion073354	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 15
63	Dr. Juan Gilbert's Patent No. US 11, 036, 442 B2 for "Transparent Interactive Printing Interface"	Dkt. 1220-9 Gilbert Dep. Ex. 3
64	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 5 – STATE-DEFENDANTS- 00108789	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 5
65	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 6 – STATE-DEFENDANTS- 00110732	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 6

PX No.	Document Description	Citation
66	E-mail string from Ryan Germany to Frances Watson and Chris Harvey re Polling Machine Issues	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 26
67	Dominion043450	Dkt. 1631-14
68	Dominion043452	Dkt. 1631-15
69	Dominion042793	Dkt. 1631-16
70	Dominion043377	Dkt. 1631-17
71	Dominion043484	Dkt. 1631-18
72	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 16 – Dominion043437	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 16
73	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 18 - STATE- DEFENDANTS-001 04453	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 18
74	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 5 (State Defs.’ objections and responses to Curling Pls.’ first set of interrogatories)	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 5
75	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 6 (State Defs.’ objections and responses to Curling Pls.’ second set of interrogatories)	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 6
76	Curling Plaintiffs’ joint discovery statement regarding State Defendants’ responses to Curling Plaintiffs’ second set of interrogatories and CISA request	Dkt. 1177
77	Oct. 21, 2021 State Defs’ Response to Revised Interrogatories	Dkt. 1631-26
78	J. Barnes Dep. Ex. 6 - May 2021 Email re CyberNinjas	J. Barnes Dep. Ex. 6 Ridlehoover

PX No.	Document Description	Citation
		Dep. Ex. 14
79	State Defendants' Motion to Seal Halderman Report	Dkt. 1132
80	PD1 - Halderman video stills	Dkt. 892-1
81	PX02 - Side-by-side of Ballots from system hack	Dkt. 892-4
82	PX03 - Scanner Results of Photocopied Ballots	Dkt. 892-5
83	STATE-DEFENDANTS-00047579	Dkt. 1635-25
84	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 5 - Interview by Atlanta Press Club with Brad Raffensperger, Sec'y of State, GA (Feb. 10, 2022)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 5
85	Ga. Sec'y of State's announcement: <i>Secretary Raffensperger Calls on J. Alex Halderman to Agree to Release "Secret Report" and Pre-Election Testimony</i> (Jan. 27, 2022)	Dkt. 1631-39
86	Jan. 20, 2022 statement of interest explaining the vulnerability disclosure program operated by the U.S. Department of Homeland Security	Dkt. 1631-43
87	Notice by CISA regarding CVD process and its timeline	Dkt. 1314
88	CISA's 90-day status report updating the Court and the parties on the final steps of CISA's coordinated vulnerability disclosure process	Dkt. 1381
89	CISA's ICS advisory, U.S. Dep't of Homeland Security, Cybersecurity & Infrastructure Security Agency, <i>Vulnerabilities Affecting Dominion Voting Systems ImageCast X</i> , ICS Advisory No. ICSA-22-154-01 (June 3, 2022)	Dkt. 1631-46
90	CISA's 30-day report on CISA's CVD process	Dkt. 1343
91	CISA's 60-day status report on CISA's CVD process	Dkt. 1371
92	Wenke Lee Article (Oct. 8, 2018)	Dkt. 615-2
93	Nov. 17, 2021 Halderman Dep. Ex. 5 – Aug. 31, 2021 Decl. of J. Alex Halderman, <i>Coomer v. Donald J. Trump for President</i> , No. 2020cv034319 (Dist. Ct. Denver Cnty. Colo.)	Nov. 17, 2021 Halderman Dep. Ex. 5

PX No.	Document Description	Citation
94	FORTALICE000124 - Apr. 9, 2021 Fortalice Technical Assessment	Dkt. 1635-28
95	November 2018 Fortalice Report	Dkt. 510-6 PX03 (July 2019 PI Hearing) Hamilton Dep. Ex. 4
96	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 10 - FORTALICE000625	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 10 Hamilton Dep. Ex. 19
97	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 1 - FORTALICE003593	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 1
98	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 2 - FORTALICE003807	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 2
99	July 14, 2021 email from Meghan Aubry (Fortalice) to Adam Sparks	Dkt. 1632-9
100	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 4 – STATE-DEFENDANTS- 00101460	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 4
101	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 25 – STATE DEFENDANTS-00178061	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 25
102	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 5 - STATE-DEFENDANTS- 00101471	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 5



PX No.	Document Description	Citation
103	Feb. 11, 2022 SOS 30b6 (M. Barnes) Ex. 7 - STATE-DEFENDANTS- 00158505	Feb. 11, 2022 SOS 30b6 (M. Barnes) Ex. 7
104	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 22 - STATE- DEFENDANTS-00157919	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 22
105	STATE-DEFENDANTS-00161382	
106	ELECTIONS_00000330 (Nov. 20, 2020 email sent from Dwight Bower to Richard Barron, Derrick Gilstrap, and Timothy Cummings)	Dkt. 1632-18
107	The White House, <i>Notice on the Continuation of the National Emergency With Respect to Foreign Interference In or Undermining Public Confidence in United States Elections</i> (Sept. 7, 2022)	Dkt. 1632-19
108	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 24 - STATE-DEFENDANTS- 00182284	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 24
109	Jan. 28, 2022 SOS 30b6 (Harvey) Ex. 11 - STATE-DEFENDANTS- 00139190	Jan. 28, 2022 SOS 30b6 (Harvey) Ex. 11
110	Misty Hampton Messages with Eric Chaney (Full - 24 pages total)	Coffee County BOE 30b6 (Stone) Dep. Ex. 14 Hampton Dep. Ex. 3 Ridlehoover Dep. Ex. 16 Chaney Dep. Ex. 9

PX No.	Document Description	Citation
111	"Text Messages.pdf" produced by Misty Hampton	Hampton Dep. Ex. 4 Latham Dep. Ex. 6 Ridlehoover Dep. Ex. 17
112	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 10 - Coffee County Exterior Surveillance Video still shots (Jan. 7)	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 10 -
113	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 11 - Coffee County Exterior Surveillance Video still shots (Jan. 8)	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 11
114	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 8 - Maggio 08122022-000034	Chaney Dep. Ex. 10 SullivanStrickler 30b6 (Felicetti) Dep. Ex. 8 Logan Dep. Ex. 8
115	SullivanStrickler - Log of IP addresses that have downloaded CC Data	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 17
116	Minute Sheet for proceedings held in Open Court, <i>Pearson et. al v. Kemp et al</i> , No. 1:20-cv-04809-TCB (N.D. Ga. Dec. 7, 2020)	Dkt. 1632-30
117	Coffee County BOE 30b6 (Stone) Dep. Ex. 7 – Coffee County Surveillance Video still shots of Jeffrey Lenberg (Jan. 27-29)	Coffee County BOE 30b6 (Stone) Dep. Ex. 7
118	Coffee County BOE 30b6 (Stone) Dep. Ex. 8 - Coffee County Surveillance Video still shots of Jeffrey Lenberg & Doug Logan (Jan. 18-19)	Coffee County BOE

PX No.	Document Description	Citation
		30b6 (Stone) Dep. Ex. 8
119	Lenberg Dep. Ex. 5 (Coffee County ICC & ICP Reports)	Lenberg Dep. Ex. 5
120	Lenberg Dep. Ex. 10 (Misty Hampton preparing thumb drive for Jeffrey Lenberg)	Lenberg Dep. Ex. 10
121	Jan. 7, 2023 Halderman Supplemental Decl. re Coffee County	Dkt. 1635-38
122	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 21 (email chain, dated July 27, 2022, between Bruce Brown and Josh Belifante)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 21
123	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 18 (Mike Lindell Flight)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 18 Hampton Dep. Ex. 11
124	Coffee County BOE 30b6 (Stone) Dep. Ex. 16 (Feb. 25, 2021 letter from Jil Riddlehoover to Coffee County BOE)	Coffee County BOE 30b6 (Stone) Dep. Ex. 16
125	Coffee County BOE 30b6 (Stone) Dep. Ex. 17 (Feb. 25, 2021 letter from Misty Hampton to Coffee County BOE)	Coffee County BOE 30b6 (Stone) Dep. Ex. 17
126	Excerpt of Ed Voyles production file, which contains a Feb. 24, 2021 text message thread between Ed Voyles and Misty Hampton	Dkt. 1632-42
127	FORTALICE001658 - Feb. 26, 2021 Evidence Collection Protocol	Dkt. 1635-39

PX No.	Document Description	Citation
128	Ga. Sec'y of State, <i>Raffensperger to Replace Coffee County Election Equipment, End Distraction for Local Election Officials</i> (Sept. 23, 2022)	Dkt. 1632-45
129	Sept. 23, 2022 State Defendants Notice Regarding Coffee County Equipment	Dkt. 1492
130	Coffee County Acceptance Testing Documents	Dkt. 1377-4
131	Intentionally Left Blank	
132	Email thread from Sept. 26, 2022 between David Cross, Bruce Brown, and Bryan Tyson	Dkt. 1632-50
133	Jan. 16, 2023 Email from B. Tyson to R. Abney and C. Middleton	Dkt. 1633-2
134	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 8 - Letter to GBI	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 8
135	State Defendant's Brief re Investigative Privilege	Dkt. 1427
136	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 11 - SOS-INV000048	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 11
137	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 13 - SOS-INV000060	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 13
138	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 14 - SOS-INV000014	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 14
139	SOS-INV000041	Dkt. 1635-41
140	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 17 (Coffee County surveillance video still shots)	Oct. 12, 2022 SOS 30b6

PX No.	Document Description	Citation
		(Sterling) Dep. Ex. 17
141	SOS, Logan and Lenberg's surveillance video still shots	Dkt. 1489-11
142	Sinners Dep. Ex. 5 - Harry MacDougald's 45-minute call with Marilyn Marks	Sinners Dep. Ex. 5
143	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 29 - STATE-DEFENDANTS-00101937 (Dominion Notice to Counties)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 29
144	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 3 (password on post-it at the base of a monitor)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 3
145	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 7 - SOS-INV0000007	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 7
146	11Alive Staff, <i>Questions raised in timeline of state response to Coffee County breach</i> , 11Alive News (Sep. 26, 2022, 1:44 PM)	Dkt. 1633-16
147	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 6 - The Carter Center, <i>Restoring Confidence in American Elections Panel 3</i> (April 29, 2022), YouTube (May 9, 2022)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 6
148	SOS-INV000144 (SEB case list)	Dkt. 1633-18
149	Ga. Sec'y of State, <i>Secretary Raffensperger Calls on Department of Justice to Investigate Allegation of Fulton County Shredding Applications</i> (Oct. 11, 2021)	Dkt. 1633-29

PX No.	Document Description	Citation
150	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 4 - Université de Genève (UNIGE), <i>How to safeguard democracy? A look back at the last American presidential election. Gabriel Sterling</i> , YouTube (Oct. 4, 2021, uploaded Nov. 25, 2021)	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 4
151	August 2020 State Defs.' Opp. to Curling Pls.' Preliminary Injunction Motion	Dkt. 821
152	ELECTIONS 00000091	Dkt. 1633-43
153	ELECTIONS 00000127	Dkt. 1633-44
154	ELECTIONS 00000194	Dkt. 1633-45
155	ELECTIONS 00000198	Dkt. 1633-46
156	ELECTIONS 00000189	Dkt. 1633-47
157	Jan. 21, 2022 Fulton Cnty 30b6 (Gilstrap) Dep. Tr. Ex. 7 - STATE- DEFENDANTS-00169113	Jan. 21, 2022 Fulton Cnty 30b6 (Gilstrap) Dep. Tr. Ex. 7
158	Coffee County BOE 30b6 (Stone) Dep. Tr. Ex. 3 - Coffee County Surveillance Video Still Shots	Coffee County BOE 30b6 (Stone) Dep. Tr. Ex. 3
159	Updated January 7, 2021 Coffee County Surveillance Video Still Shots	Dkt. 1489-8
160	Ben Adida Twitter (October 2, 2022) (HMPB + 1 BMD)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 4
161	September 2018 Wenke Lee Presentation	Dkt. 313-1
162	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 19 - Maggio 08122022-000098 (FedEx Shipping Requests & Labels)	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 19

PX No.	Document Description	Citation
163	Chaney Dep. Ex. 4—STATE-DEFENDANTS 0020100 (SEB2020-250 Investigation Report)	Chaney Dep. Ex. 4
164	Lindsey Dep. Ex. 6 - The Carter Center, <i>Restoring Confidence in American Elections Panel 3</i> (April 29, 2022), YouTube (May 9, 2022)	Lindsey Dep. Ex. 6
165	Georgia’s 2022 Statewide Risk Limiting Audit Confirms Results _ Georgia Secretary of State (Feb. 10, 2023).	Dkt. 1634-11
166	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 12 - All Photos - Maggio 08122022-000236 to 265	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 12
167	October 2022 State Defs.’ Opp to Coalition Pls.’ Emergency Motion for Relief re Protective Order	Dkt. 1517
168	July 20, 2022 Ryan Germany Email re Interview CC	Dkt. 1440-7
169	February 2021 State Defs.’ Brief re Standing	Dkt. 1066
170	August 2020 Fulton Cnty Opp. to Curling Pls.’ Preliminary Injunction Motion	Dkt. 878
171	November 2019 State Defs.’ Reply ISO MTD Pls.’ Amended Complaints	Dkt. 653
172	October 2017 Fulton Cnty Defs.’ Reply ISO Motion to Dismiss	Dkt. 100
173	June 2022 Ex. A—December 2021 SEB Hearing Transcript-Coffee County Portion	Dkt. 1397-1
174	Andrew W. Appel et. al., <i>Ballot-Marking Devices (BMDs) Cannot Assure the Will of the Voters</i> , Election L. J., 20 (Feb. 14, 2020)	Dkt. 855-3 at Ex. B
175	Fulton Cnty Response to Coalition Pls 2nd RFA	Dkt. 1297-6
176	Email re 2nd follow-up requesting documents	Dkt. 1360-5
177	August 2017 State Defs’ Brief ISO MTD	Dkt. 8-1
178	September 2022 State Defs.’ Notice of Conditional Objection to September 9 Proceeding.	Dkt. 1473

PX No.	Document Description	Citation
179	Greg Freemyer—Combined Posts	Dkt. 1634-50
180	Dec. 12, 2018 SAFE Commission Tr.	Dkt. 1551-2
181	SOS-INV000053	Oct 12 Sterling 30b6 Ex. 9
182	SOS-INV000087	Oct 12 Sterling 30b6 Ex. 10
183	Monday, 11-16-20 19:24 UTC Message # 155, from Hampton, to Voyles, Subject: ORR	Oct 12 Sterling 30b6 Ex. 12
184	4-25-22 Printout of Case Sheet for SEB2020-250-Coffee County Misc	Oct 12 Sterling 30b6 Ex. 15
185	Coffee County surveillance video interior still shots (Jan. 7) - 62 images	Oct 12 Sterling 30b6 Ex. 16
186	SOS-INV000103	Oct 12 Sterling 30b6 Ex. 22
187	RollingStone: Pro-Trump Georgia Officials Plotted to Swipe Voting Data. We Caught Them.	Oct 12 Sterling 30b6 Ex. 24
188	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 25 - Chris Harvey SOS Notice to Counties re ORR for election software	Oct 12 Sterling 30b6 Ex. 25 Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 13
189	SOS Press Release: Secretary of State's Office Opens Investigation into Coffee County's Handling of Recount	Oct 12 Sterling 30b6 Ex. 26
190	10102022-000141	Oct 12 Sterling 30b6 Ex. 27



PX No.	Document Description	Citation
191	DOJ Ltr to Karen Fann (President of Arizona State Senate) re Maricopa County audit and Cyber Ninjas	Oct 12 Sterling 30b6 Ex. 28
192	SOS Press Release: The MITRE Corporation, an Independent Federal Lab, finds Georgia Election System Secure	Oct 12 Sterling 30b6 Ex. 30
193	Executive Summary - July 2022 MITRE Report	Dkt. 1486-1 Oct 12 Sterling 30b6 Ex. 31
194	Email chain with Michael Barnes, Blake Evans, and others	Oct 12 Sterling 30b6 Ex. 32
195	Gabe Sterling LinkedIn	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 2
196	Excerpted pages of "Integrity Counts" by Brad Raffensperger	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 3
197	Nov. 23, 2021 State Defs.' Responses to Curling Pls.' Requests for Admission	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 7
198	STATE-DEFENDANTS-00113751	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 8
199	STATE-DEFENDANTS-00169353	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 10

PX No.	Document Description	Citation
200	STATE- DEFENDANTS-00192602	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 11
201	Audio Recording - Scott Hall	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 12 Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 12
202	STATE-DEFENDANTS-11151729	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 17
203	Dominion Voting brochure re: Mobile ballot printing	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 18
204	Ga. Code Ann. § 21-2-498. Precertification tabulation audits; rules and regulations; risk-limiting audit pilot program	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 19
205	Rule 183-1-15-.04 Audit	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 20
206	Arlo instructions re ballot manifest	Feb. 24, 2022 SOS 30b6

PX No.	Document Description	Citation
		(Sterling) Ex. 21
207	CGG06SterlingDeKalbBatchSheetsListOfficialArlo withCGGtotal_XLS.xl sx	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 22
208	Kemp Ltr to SEB re analysis of inconsistencies with Fulton County 2020 Risk-Limiting Audit Report (RLA)	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 23
209	DeKalb County Audit Board Batch Sheet 0262	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 24
210	DeKalb County Audit Board Batch Sheet 0260	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 25
211	DeKalb County Audit Board Batch Sheet 0140	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 27
212	DeKalb County Audit Board Batch Sheet 0117	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 28
213	DeKalb County Audit Board Batch Sheet 0104	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 29

PX No.	Document Description	Citation
214	Senator Walker & Rep. Blackmon Ltr to SEB re Kemp's report re 2020 Risk-Limiting Audit Report	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 30
215	Fox5Atlanta: Software glitch causes delay counting thousands of votes in Gwinnett County	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 32
216	Whittier Daily News: A behind the scenes look at Georgia's vote-counting	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 33
217	Defendants Secretary of State Brad Raffensperger, State Election Board, and State Election Board Members' Response to Order Dated April 16, 2019	June 27, 2019 Barnes (DRE) Ex. 20
218	CGG's ORR to Jeff Milsteen, KSU (190pgs of material)	June 27, 2019 Barnes (DRE) Ex. 21
219	Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 12.4 Challenge Board	June 27, 2019 Barnes (DRE) Ex. 22
220	Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 2.3 Deleting a Database	June 27, 2019 Barnes (DRE) Ex. 23
221	Ballot image printout from GEMS computer	June 27, 2019 Barnes (DRE) Ex. 24
222	Ballot image report from a GEMS computer	June 27, 2019 Barnes (DRE) Ex. 25
223	Handwritten note about Fulton precinct	June 27, 2019 Barnes (DRE) Ex. 26

PX No.	Document Description	Citation
224	Direct Record Electronic Voting Machine Recap records	June 27, 2019 Barnes (DRE) Ex. 27
225	Photo of machine serial numbers of DRE machines	June 27, 2019 Barnes (DRE) Ex. 28
226	USA vs. Netyksho, et al. Indictment	June 27, 2019 Barnes (DRE) Ex. 29
227	Russian Targeting of Election Infrastructure During the 2016 Election: Summary of Initial Findings and Recommendations, May 8, 2018	June 27, 2019 Barnes (DRE) Ex. 30
228	"Who, What, Why" article titled "Kemp's Aggressive Gambit to Distract from Election Security Crisis."	June 27, 2019 Barnes (DRE) Ex. 31
229	SOS Press Release: After Failed Hacking Attempt SOS Launches Investigation into Georgia Democratic Party	June 27, 2019 Barnes (DRE) Ex. 32
230	Michael Barnes LinkedIn	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 2
231	Michael Barnes LinkedIn	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 3
232	Dominion017810	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 5
233	STATE-DEFENDANTS-00157766	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 6

PX No.	Document Description	Citation
234	STATE-DEFENDANTS-00158494	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 8
235	STATE-DEFENDANTS-00157783	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 9
236	Dominion042072	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 10
237	Dominion042114	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 11
238	Dominion042575	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 13
239	Dominion042641	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 14
240	Dominion042793	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 15
241	Dominion043491	Feb. 11, 2022 SOS 30b6 (M.

PX No.	Document Description	Citation
		Barnes) Dep. Ex. 17
242	Dominion043648	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 19
243	Dominion043765	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 20
244	Aug. 4, 2020 Email Chain from Rick Barron	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 23
245	STATE-DEFENDANTS-00161074	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 24
246	STATE-DEFENDANTS-00127945	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 25
247	Dominion069731	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 26
248	Chris Harvey LinkedIn	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 2

PX No.	Document Description	Citation
249	STATE-DEFENDANTS-00108321	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 6
250	STATE-DEFENDANTS-00108787	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 7
251	STATE-DEFENDANTS-00110230	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 8
252	STATE-DEFENDANTS-00115480	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 9
253	STATE-DEFENDANTS-00117430	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 10
254	FORTALICE001209	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 12 Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 12 Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 8 Hamilton Dep. Ex. 15
255	Dominion069648	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 13



PX No.	Document Description	Citation
256	Dominion072216	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 14
257	Dominion074766	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 16
258	Dominion074784	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 17
259	Dominion076086	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 18
260	STATE-DEFENDANTS-00200997	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 19
261	STATE-DEFENDANTS-00165630	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 20
262	§ 21-2-379.22	Jan. 28, 2022 SOS 30b6 (Harvey) (CGG Dep. Ex. 1)
263	Photo by Chris Aluka Berry (Reuters) "People cast their ballots during early voting for the presidential elections at State Farm Arena in Atlanta, Ga., October 12, 2020"	Jan. 28, 2022 SOS 30b6 (Harvey) (CGG Dep. Ex. 4)
264	Secure the Vote: Precinct Layout to Aid with Privacy Training	Jan. 28, 2022 SOS 30b6 (Harvey)

PX No.	Document Description	Citation
		(CGG Dep. Ex. 12)
265	Dec. 1, 2020 - Chris Harvey Official Election Bulletin re "Preserving Ballot Images and Delivering to Sec. of State"	Jan. 28, 2022 SOS 30b6 (Harvey) (CGG Dep. Ex. 14)
266	Excerpt of Rockdale000924 (with highlighting added)	Jan. 28, 2022 SOS 30b6 (Harvey) (CGG Dep. Ex. 16)
267	Curling Plaintiffs' Third Amended Notice of Deposition of Fulton County D	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 1
268	E-mail string from Scott Tucker to Blake Evans re Two ballots printing	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 9
269	E-mail string from Chris Harvey to Richard Barron re Fulton County - Machines Down and Polling Places Not Open	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 10
270	E-mail string from Blake Evans to Richard Barron & others re Elections complaint from Thomas Elliott	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 13
271	E-mail string from Richard Barron to Brigitte Bailey, Gabriel Sterling and Dwight Brower re Fulton Advance Voting Issue	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 19
272	E-mail string from Richard Barron to Julie Houk and Ryan Germany re Urgent demands to send corrected absentee ballots to Fulton Co. Voters...	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 27

PX No.	Document Description	Citation
273	12-14-18, E-mail from Richard Barron to list re Voting system input from Fulton County, and 1-3-19 E-mail from Joseph Kirk to list re My thoughts about our next voting system	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 31
274	E-mail string from Gabriel Sterling to Chris Harvey re Fulton County ExpressPolls	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 33
275	Seven Hills Strategies report re State Election Board	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 34
276	Seven Hills Strategies report re State Election Board - Post-Election Executive Summary	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 35
277	Merritt Beaver LinkedIn	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 4
278	Email chain re action items for the Air Gap Elections Center Network	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 6
279	Email chain re Dominion tech on the Gwinnett video used a flash drive on a laptop connected to E-Net	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 7
280	Information Technology Security Program Charter	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 9
281	July 2020 Email re Statement of Work & Rules of Engagement with Fortalice	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 11

PX No.	Document Description	Citation
		Hamilton Dep. Ex. 1
282	Email chain re threat "I bet I can hack your electronic voting machines."	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 13 Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 9 Hamilton Dep. Ex. 11
283	Email from Dave Hamilton to Merritt Beaver re Risk Register and attaching "SOS - Remediation Task List v13.1.xlsx"	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 19 Hamilton Dep. Ex. 21
284	SOS - Remediation Task List v13.1.xlsx	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 20 Hamilton Dep. Ex. 22
285	Alert re ransomware infection affecting Jekyll Island Authority	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 21
286	July 10, 2020 Rules of Engagement (Fortalice & GA SOS)	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 22
287	Email chain from Dave Hamilton re TeamViewer	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 23

PX No.	Document Description	Citation
288	Email chain re BMDs not reading the cards	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 25
289	Email chain between IT department and Civix re Latest Version of Open Issues Tracking	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 26
290	Email chain re security vulnerabilities identified in PCC scan from Fortalice	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 27
291	Email chain re Election Center - Infrastructure Server - Proposed changes	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 28
292	FORTALICE003625 (Aug. 25, 2020 Draft Technical Assessment (15 pgs))	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 4
293	FORTALICE003678 (Aug. 25, 2020 Draft Technical Assessment (14 pgs))	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 5
294	FORTALICE000650 (Nov. 25, 2020 Fulton County Laptop Forensic Review)	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 7
295	Curling Plaintiffs' Fifth Amended Notice of Deposition of Office of the Secretary of State	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 11
296	David Hamilton LinkedIn	Hamilton Dep. Ex. 2
297	Email from Logan Lamb to Merle King, later forwarded to Michael Barnes re KSU server	Hamilton Dep. Ex. 3

PX No.	Document Description	Citation
298	Fortalice Task Order re Incident Response Support	Hamilton Dep. Ex. 6
299	Fortalice Status Updates	Hamilton Dep. Ex. 7
300	Email from Dave Hamilton re Potential leakage of voter data	Hamilton Dep. Ex. 9
301	CBS Atlanta article "UPDATE: Ransomware Attackers Hit Hall County Election Infrastructure"	Hamilton Dep. Ex. 10
302	Email chain re Election Center Visit Notes and enclosing "SOS - Site Visit.docx"	Hamilton Dep. Ex. 12
303	SOS - Site Visit.docx	Hamilton Dep. Ex. 13
304	Email from Dave Hamilton re encryption	Hamilton Dep. Ex. 20
305	Email chain re CyberSecurity Incident Response Plan	Hamilton Dep. Ex. 24
306	Curling Pls Doc Subpoena to Eric Chaney	Chaney Dep. Ex. 1
307	Coalition Pls Doc Subpoena to Eric Chaney	Chaney Dep. Ex. 2
308	Chaney Response to Coalition Pls Doc Subpoena	Chaney Dep. Ex. 3
309	Dec. 10, 2020 Letter to House Governmental Affairs Committee	Chaney Dep. Ex. 6
310	Email chain with Emma Brown (WaPo), Jennifer Herzog & Eric Chaney denying Coffee County breach	Chaney Dep. Ex. 8
311	Robert A. Sinners LinkedIn	Chaney Dep. Ex. 12

PX No.	Document Description	Citation
312	Shawn Still v. Raffensperger Complaint	Chaney Dep. Ex. 13 Hampton Dep. Ex. 12
313	"TLP: White" Version of CISA's ICS advisory, U.S. Dep't of Homeland Security, Cybersecurity & Infrastructure Security Agency, <i>Vulnerabilities Affecting Dominion Voting Systems ImageCast X</i> , ICS Advisory No. ICSA- 22-154-01 (June 3, 2022)	J. Barnes Dep. Ex. 2 Coffee County BOE 30b6 (Stone) Dep. Ex. 30
314	"TLP: Red" Version of CISA's ICS advisory, U.S. Dep't of Homeland Security, Cybersecurity & Infrastructure Security Agency, <i>Vulnerabilities Affecting Dominion Voting Systems ImageCast X</i> , ICS Advisory No. ICSA- 22-XXX-0X (STATE-DEFENDANTS-00202234-38)	
315	Letter enclosing BC0001-0008	Cotton Dep. Ex. 3
316	Mark Niesse, Pro-Trump tech team copied Georgia election data, record show, Atlanta-Journal Constitution	Cotton Dep. Ex. 4
317	Coffee County BOE 30b6 (Stone) Dep. Ex. 2 – Coffee County Surveillance Video still shots of Eric Chaney (Jan. 7 & 8)	Coffee County BOE 30b6 (Stone) Dep. Ex. 2
318	Collection of CC BOE Monthly Board Meeting Minutes (25 pgs)	Coffee County BOE 30b6 (Stone) Dep. Ex. 10 Chaney Dep. Ex. 7
319	Eric Chaney Resignation from CC BOE	Coffee County BOE 30b6 (Stone) Dep. Ex. 11

PX No.	Document Description	Citation
320	Emails re Misty Hampton's ORR request for the surveillance videos & timesheets	Coffee County BOE 30b6 (Stone) Dep. Ex. 23 Hampton Dep. Ex. 7
321	SullivanStrickler Engagement Agreement with Jesse Binnall ("subsequent work in the State of Georgia")	Coffee County BOE 30b6 (Stone) Dep. Ex. 26 SullivanStrickler 30b6 (Felicetti) Dep. Ex. 6 Cruce Dep. Ex. 4
322	Dominion089393	Coffee County BOE 30b6 (Stone) Dep. Ex. D003
323	Declaration of Jeffrey E. Lenberg re Election Integrity Investigations Augus	Lenberg Dep. Ex. 2
324	"Coffee_Messages.pdf" produced by Doug Logan on 11/10/22	Lenberg Dep. Ex. 3
325	"12. Coffee & Pierce Cty Records Requests.pdf" produced by Jeffrey Lenbe	Lenberg Dep. Ex. 6
326	Jan 27 & 29, 2021 Lenberg surveillance video still shots (re ring light)	Lenberg Dep. Ex. 9
327	Jan 18-19, 2021 Lenberg surveillance video still shots (exterior arrival & ex	Lenberg Dep. Ex. 11
328	Jan. 27, 2021 ORR request from Jeff Lenberg to Misty Hampton re thumb d	Lenberg Dep. Ex. 14
329	Oct. 27, 2021 Email from Charles Dial re Misty Hampton email recovery	J. Barnes Dep. Ex. 1



PX No.	Document Description	Citation
330	Misty Hampton Messages with "Gary W Diminion" (Full - 13 pages total)	Hampton Dep. Ex. 2
331	Jan 7 surveillance video still shot (Cathy Latham in Interior) - 1 image	Hampton Dep. Ex. 17
332	Jan 7 surveillance video still shot (interior) - 8 images	Hampton Dep. Ex. 19
333	DouglasNow Article "Board of Elections accepts employee resignations, ele	Ridlehoover Dep. Ex. 1
334	Stillshot of Jil Ridlehoover in DouglasNow "Dominion Voting Machine Fla	Ridlehoover Dep. Ex. 3
335	Stillshot of Ed Voyles, Wendell Stone, and Diana (Misty's daughter) in Dou	Ridlehoover Dep. Ex. 5
336	Stillshot of Matthew McCullough in DouglasNow "Dominion Voting Mach	Ridlehoover Dep. Ex. 13
337	CES Memos to Coffee County enclosing EMS passwords for elections (as c	Ridlehoover Dep. Ex. 15 SullivanStrickler 30b6 (Felicetti) Dep. Ex. 13
338	Text Messages produced by Doug Logan re Coffee County trip	Logan Dep. Ex. 4
339	Excerpt of SullivanStrickler - Log of email addresses that have access to CC	Logan Dep. Ex. 5 SullivanStrickler 30b6 (Felicetti) Dep. Ex. 16
340	Screenshot from drive produced by Doug Logan (screenshot created by CG	Logan Dep. Ex. 9

PX No.	Document Description	Citation
341	Headshot of Jennifer Jackson	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 3
342	Headshot of Karuna Naik	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 4
343	Headshot of Paul Maggio	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 5
344	SullivanStrickler Engagement Agreement with Sidney Powell (Michigan work)	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 7
345	Text Messages produced by Paul Maggio (one with Cathy Latham, one with	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 9
346	Folder Tree of data produced by SullivanStrickler "SSA1722 HARD DRIV	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 14
347	Email from Jennifer Jackson to Paul Maggio, Greg Freemyer, and Karuna N	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 20
348	SSA 1722 Coffee County.xlsx	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 21
349	Defending the Republic, Inc. check made out to SullivanStrickler for \$26,2	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 28

PX No.	Document Description	Citation
350	Email chain (Favorito, Voyles, Hampton, Latham, Marks) forwarding Chris	Voyles Dep. Ex. 9
351	Jan 7 Surveillance video still shots (with Ed Voyles)	Voyles Dep. Ex. 10
352	Jan 7 Surveillance video still shots (Ed Voyles carrying in scanner)	Voyles Dep. Ex. 11
353	March 8-9, 2021 Marilyn Marks text messages with Ed Voyles	Voyles Dep. Ex. 14
354	Curling Pls' Subpoena to Latham	Latham Dep. Ex. 1
355	CGG Subpoena to Latham and Ex. 1 (Draft Executive Orders - Dec 16 & 1	Latham Dep. Ex. 2
356	Dec. 23, 2020 Dominion's Notice of Obligation to Preserve Documents to C	Latham Dep. Ex. 4
357	Draft Executive Order "Presidential Findings to Preserve Collect and Analy	Latham Dep. Ex. 5
358	Jan. 6, 2021 Email from Misty Hampton to Scott Hall enclosing "ICC LOG	Cruce Dep. Ex. 2
359	Jan. 7 Surveillance video still shots of Alex Cruce	Cruce Dep. Ex. 3
360	Article entitled "Why computer scientists prefer paper ballots"	Gilbert Dep. Ex. 4
361	Gilbert Twitter	Gilbert Dep. Ex. 7
362	Nov. 8, 2019 Engagement Letter between GA SOS & SEB and Dr. Juan Gil	Gilbert Dep. Ex. 8
363	Excerpt of <i>Gusciora v. Corzine</i> , Mar. 24, 2009 Trial Tr. (Dr. Shamos)	Gilbert Dep. Ex. 9
364	Donna Curling ENET Report (Redacted)	Dkt. 1569-18
365	Donna Price ENET Report (Redacted)	Dkt. 1569-21
366	Jeffrey Schoenberg ENET Report (Redacted)	Dkt. 1569-23
367	Schoenberg Absentee ENET Report	Dkt. 1569-24
368	Laura Digges ENET Report (Redacted)	Dkt. 1569-29
369	William Digges ENET Report (Redacted)	Dkt. 1569-32
370	Ricardo Davis ENET Report (Redacted)	Dkt. 1569-34
371	Megan Missett ENET Report (Redacted)	Dkt. 1569-36
372	Redacted GBI Report	

PX No.	Document Description	Citation
373	S. Ellis letter to V. Reynolds, "Request for Assistance in Investigation," Aug. 2, 2022	
374	R. Germany email to S. Ellis, S. Koth, re: meeting with GBI Agents, Aug. 17, 2022.	
375	S. Ellis email to J. Herzog, A. Rowell, R. Germany re: Coffee County SEB Investigation, July 21, 2022.	
376	SOS-INV000010	
377	SOS-INV000084	
378	W. Stone email to S. Koth re: "Coffee County Elections Investigation", June 7, 2023	
379	Stephanie Texts 06-03-forward.pdf - AZ Senate shared in their "Reading Room" [https://web.tresorit.com/l/XMN4J#pqSHHqcq_c_eP90cdWcdSg], in the folder "2023-07-26 Uploads".	
380	June 9, 2020 – Presidential Preference Primary – General Primary – Nonpartisan General Election – Special Election: <a href="https://results.enr.clarityelections.com//GA//103613/256509/reports/summary.zip">https://results.enr.clarityelections.com//GA//103613/256509/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/103613/web.255599/#/summary">https://results.enr.clarityelections.com/GA/103613/web.255599/#/summary</a> )	
381	November 3, 2020 - General Election: <a href="https://results.enr.clarityelections.com//GA//105369/271927/reports/summary.zip">https://results.enr.clarityelections.com//GA//105369/271927/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/105369/web.264614/#/summary">https://results.enr.clarityelections.com/GA/105369/web.264614/#/summary</a> )	

PX No.	Document Description	Citation
382	January 5, 2021 – Federal Runoff: <a href="https://results.enr.clarityelections.com//GA//107556/275242/reports/summary.zip">https://results.enr.clarityelections.com//GA//107556/275242/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/107556/web.274956/#/summary">https://results.enr.clarityelections.com/GA/107556/web.274956/#/summary</a> )	
383	May 24 2022 – General Primary/Special Election: <a href="https://results.enr.clarityelections.com//GA//113667/294374/reports/summary.zip">https://results.enr.clarityelections.com//GA//113667/294374/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/113667/web.285569/#/summary">https://results.enr.clarityelections.com/GA/113667/web.285569/#/summary</a> )	
384	November 8, 2022 – General/Special Election: <a href="https://results.enr.clarityelections.com//GA//115465/314082/reports/summary.zip">https://results.enr.clarityelections.com//GA//115465/314082/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/115465/web.307039/#/summary">https://results.enr.clarityelections.com/GA/115465/web.307039/#/summary</a> )	
385	Fayette ballot from Discovery 00010 00000 052768	PX01 (Sept. 2020 PI Hearing)
386	Dominion Voting, Democracy Suite Windows Build Document	PX09 (Sept. 2020 PI Hearing)
387	EAC Certification	PX10 (Sept. 2020 PI Hearing)
388	Emergency ballot exhibit with hand-marking	PX53 (Sept. 2020 PI Hearing)
389	Charles Stewart III & Stephen Ansolabehere, <i>Waiting to Vote</i> , 14 Election L. J. 47 (2015)	PX61 (Sept. 2020 PI Hearing)

PX No.	Document Description	Citation
390	William A. Edelstein & Arthur D. Edelstein, <i>Queuing and Elections: Long Lines, DREs and Paper Ballots, as presented at the 2010 Electronic Voting Technology Workshop/Workshop on Trustworthy Elections</i> , in Washington, D.C., Aug. 9-10, 2010.	PX62 (Sept. 2020 PI Hearing)
391	Gilbert Demonstrative: Spreadsheet Example	PD17 (Sept. 2020 PI Hearing)
392	Dominion043404	PX40 (Sept. 2020 PI Hearing)
393	Dominion043477	PX51 (Sept. 2020 PI Hearing)
394	Pro V&V 5.5A GA	PX54 (Sept. 2020 PI Hearing)
395	Stark Demonstrative: Georgia Attorney General Contest, 2018	PD16 (Sept. 2020 PI Hearing)
396	Fulton games	PX04 (Sept. 2020 PI Hearing)
397	Cherokee Xbox games	PX05 (Sept. 2020 PI Hearing)
398	Application log gap	PX06 (Sept. 2020 PI Hearing)
399	Uncounted ICC ballots (Excerpt of Dkt. No. 809-5, Marks Declaration)	PX07 (Sept. 2020 PI Hearing)
400	Fulton County ballot examples	PX07.1 (Sept. 2020 PI Hearing)
401	Ballot 28 different results	PX12 (Sept. 2020 PI Hearing)

PX No.	Document Description	Citation
402	Adjudicated image 11.59.32	PX13 (Sept. 2020 PI Hearing)
403	Blank Ballot Dufort	PX17 (Sept. 2020 PI Hearing)
404	Russian Targeting of Election Infrastructure	PX04 (July 2019 PI Hearing)
405	Mar. 1, 2017 Email Chain discussing KSU Breach	PX05 (July 2019 PI Hearing)
406	March 3, 2017 KSU memo re Election-related files	PX06 (July 2019 PI Hearing)
407	Aug. 1, 2018 Chris Harvey Bulletin to election officials re CGG communication	PX15 (July 2019 PI Hearing)
408	Fortalice Interview Questions	PX07 (July 2019 PI Hearing)
409	Fortalice Interview Notes	PX08 (July 2019 PI Hearing)
410	Exhibits to Aug. 11, 2017 Declaration of Chris Harvey	Dkt. 49-2
411	Declaration of Michael Shamos, Ph.D., J.D.	Dkt. 472-1
412	Exhibit A to Declaration of Michael Shamos, Ph.D., J.D.	Dkt. 472-1
413	Affidavit of Nathan D. Woods	Dkt. 510-3
414	Appendices A & B to Affidavit of Nathan D. Woods	Dkt. 510-3
415	Exhibits 1 & 2 to Declaration of David D. Cross	Dkt. 692-1
416	Affidavit of Nathan D. Woods	Dkt. 692-2
417	Appendices A & B to Affidavit of Nathan D. Woods	Dkt. 692-2
418	Exhibit 1 to Aug. 28, 2020 Declaration of Chris Harvey	Dkt. 834-3

PX No.	Document Description	Citation
419	STATE-DEFENDANTS-00048065 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Dkt. 855-4
420	STATE-DEFENDANTS-00048066 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Dkt. 855-4
421	STATE-DEFENDANTS-00048068 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Dkt. 855-4
422	STATE-DEFENDANTS-00048069 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Dkt. 855-4
423	STATE-DEFENDANTS-00048070 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Dkt. 855-4
424	2021.06.28 - Expert Report of Andrew W. Appel	
425	2021.07.01 - [AEO] Expert Report of Prof. J. Alex Halderman	
426	Exhibits to 2021.07.01 - [AEO] Expert Report of Prof. J. Alex Halderman	Dkt. 1131
427	Declaration of Duncan Buell (Aug. 7, 2018)	Dkt. 260-3
428	Exhibits to Declaration of Duncan Buell (Aug. 7, 2018)	Dkt. 260-3
429	Declaration of Duncan Buell (June 29, 2017)	Dkt. 260-3
430	Declaration of Harri Hursti (Sept. 1, 2020)	Dkt. 853-2
431	Declaration of Harri Hursti (Dec 16, 2019)	Dkt. 680-1
432	Declaration of Harri Hursti (Aug. 21, 2020)	Dkt. 800-2
433	Exhibit A to Declaration of Harri Hursti (Aug. 21, 2020)	Dkt. 800-2
434	Declaration of Harri Hursti (Aug. 24, 2020)	Dkt. 809-3
435	Exhibits to Declaration of Harri Hursti (Aug. 24, 2020)	Dkt. 809-3
436	Declaration of Harri Hursti (Sept. 28, 2020)	Dkt. 923-2
437	Declaration of Harri Hursti (Oct. 4, 2020)	Dkt. 942-0
438	Declaration of Harri Hursti (Oct. 26, 2020)	
439	Exhibits to Declaration of Harri Hursti (Oct. 26, 2020)	
440	Declaration of Logan Lamb (June 30, 2017)	Dkt. 1628-15



PX No.	Document Description	Citation
441	Declaration of Logan Lamb (Aug. 3, 2018)	Dkt. 258-1
442	Exhibits to Declaration of Logan Lamb (Aug. 3, 2018)	Dkt. 258-1
443	Declaration of Logan Lamb (Jan. 14, 2020)	Dkt. 699-10
444	Declaration of Kevin Skoglund (Oct. 22, 2019)	Dkt. 640-1
445	Attachments to Declaration of Kevin Skoglund (Oct. 22, 2019)	Dkt. 640-1
446	Declaration of Kevin Skoglund (Sept. 29, 2020)	Dkt. 923-3
447	Declaration of Kevin Skoglund (Oct. 4, 2020)	Dkt. 943-0
448	Declaration of Philip B. Stark (Sept. 9, 2018)	Dkt. 296-0
449	Attachments to Declaration of Philip B. Stark (Sept. 9, 2018)	Dkt. 296-0
450	Declaration of Philip B. Stark (Sept. 30, 2018)	
451	Declaration of Philip B. Stark (Oct. 22, 2019)	Dkt. 640-1
452	Attachments to Declaration of Philip B. Stark (Oct. 22, 2019)	Dkt. 640-1
453	Declaration of Philip B. Stark (Dec. 16, 2019)	Dkt. 680-1
454	Declaration of Philip B. Stark (Aug. 23, 2020)	Dkt. 809-2
455	Declaration of Philip B. Stark (Aug. 31, 2020)	Dkt. 853-1
456	Declaration of Philip B. Stark (Sept. 13, 2020)	Dkt. 891-0
457	2021.07.16 - Expert Declaration of Juan Gilbert	Gilbert Dep. Ex. 1
458	Declaration of Dr. Benjamin Adida (Aug. 28, 2020)	Dkt. 834-2
459	Declaration of Dr. Benjamin Adida (Sept. 17, 2020)	Dkt. 912-1
460	Attachments to Declaration of Dr. Benjamin Adida (Sept. 17, 2020)	Dkt. 912-1
461	2021.07.30 - Expert Rebuttal Report of Andrew W. Appel	Dkt. 1304-4
462	2021.08.02 - Expert Rebuttal Declaration of J. Alex Halderman	Dkt. 1304-3
463	Declaration of Philip B. Stark (Aug. 2, 2021)	Dkt. 1145
464	Appendix to Declaration of Philip B. Stark (Aug. 2, 2021)	Dkt. 1145
465	Declaration of Philip B. Stark (Jan. 10, 2022)	Dkt. 1633-21
466	Appendices to Declaration of Philip B. Stark (Jan. 10, 2022)	Dkt. 1633-21
467	2022.11.10 Persinger Declaration	Dkt. 1635-40
468	Exhibits to 2022.11.10 Persinger Declaration	Dkt. 1635-40

PX No.	Document Description	Citation
469	2022.11.22 Halderman Declaration re Coffee County	Dkt 1635-19
470	2022.11.22 Halderman Exhibit_A_- SSA1722 Hard Drive Contents	Dkt 1635-19
471	2022.12.05 CGG Skoglund Declaration Confidential	Dkt. 1635-44
472	2022.12.13 Second Persinger Declaration	
473	Exhibits to 2022.12.13 Second Persinger Declaration	
474	2023.01.07 Halderman Suppl. Declaration re Coffee County	Dkt. 1635-38
475	2023.01.07 Halderman Exhibit_A_Regarding Password Reset and Changed Files	Dkt. 1635-38
476	2023.01.07 CGG Skoglund Declaration	
477	Exhibits to 2023.01.07 CGG Skoglund Declaration	
478	STATE-DEFENDANTS-00192602	
479	STATE-DEFENDANTS-00101411	
480	STATE-DEFENDANTS-00128596	
481	STATE-DEFENDANTS-00178628	
482	STATE-DEFENDANTS-00101673	
483	STATE-DEFENDANTS-00108403	
484	STATE-DEFENDANTS-00122664	
485	STATE-DEFENDANTS-00101265	
486	STATE-DEFENDANTS-00202234 (RED EMBARGOED CISA)	
487	Dominion ImageCast X (ICX) Prime 21" BMD & associated peripherals	
488	Intentionally Left Blank	
489	FBI Server Image	
490	Audio Recording of Scott Hall Phonecall	Feb. 24, 2022 SOS 30b6 (Sterling) Ex. 12
491	Feb. 10, 2022 AJC Audio Recording of Mark Niesse & Brad Raffensperger Discussing Alex Halderman's Report and Its Infeasibility in Real-World Conditions	

PX No.	Document Description	Citation
492	Audio Recording of Gabe Sterling Describing Alex Halderman's Report as Untrustworthy	
493	Coffee County Surveillance Videos	
494	The Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022), YouTube (May 9, 2022), <a href="https://www.youtube.com/watch?app=desktop&amp;v=PbB_c_PX8D8+at+approximately+35%3A30&amp;feature=youtu.be">https://www.youtube.com/watch?app=desktop&amp;v=PbB_c_PX8D8+at+approximately+35%3A30&amp;feature=youtu.be</a>	
495	Misty Hampton - DouglasNow video Pt. 1	
496	Misty Hampton - DouglasNow video Pt. 2	
497	Video of Cathy Latham - GA Senate Hearing	
498	Intentionally Left Blank	
499	jeff-lenberg-reveals-details-of-forensic-investigation-in-coffee-county-ga-after-wapo-hit-piece.mp4	
500	AP Image ID No. 21005555186625	
501	Image of Georgia Voting Machine, January 5, 2021	
502	June 7, 2021 BMD Photo	
503	Gabe Sterling, How to safeguard democracy, Universite de Geneve (Nov. 25, 2021)	
504	Pages 291-315 from Curling - CCBOE Docs Responsive to Subpoenas (1)- Jill Resignation	
505	Pages 221-245 from Curling - CCBOE Docs Responsive to Subpoenas (1)- Misty Resignation	
506	Pages 5-45 of CCBOE Responses No. 2 - DyAnna Hayes Resignation	
507	11/10/2020 email thread between Robert Sinners and Misty Hampton, Sinners Requests Official Meeting Minutes and Audio of the 11/10/2020 BOE Meeting	
508	Coffee-Cnty-ORR00000231	
509	Dominion022179	
510	Dominion023452	

PX No.	Document Description	Citation
511	Dominion069797-072989 (October 2020) Part225	
512	Dominion075160-075991 (December 2020) Part095	
513	Dominion075160-075991	
514	Dominion075992-076795 (January 2020)-emails only Part098	
515	Dominion079353-081275	
516	Dominion081276-081975 (June 2021) Part026	
517	STATE-DEFENDANTS-00001942	
518	STATE-DEFENDANTS-00099430	
519	STATE-DEFENDANTS-00100970	
520	STATE-DEFENDANTS-00194205	
521	STATE-DEFENDANTS-00101321	
522	STATE-DEFENDANTS-00095935	
523	"Lawsuit: New Georgia voting system denies secret ballot," Feb. 25, 2020, <a href="https://www.youtube.com/watch?v=7JWiursXHEo">https://www.youtube.com/watch?v=7JWiursXHEo</a>	
524	"The Office of Secretary of State State of Georgia, In the Matter of: State Election Board Meeting, Wednesday, June 21, 2023, Georgia State Capitol, Room b341, Atlanta, Georgia, 9:00am, Volume 2 of 2," June 21, 2023, <a href="https://sos.ga.gov/sites/default/files/forms/2023%20Transcripts_0.pdf">https://sos.ga.gov/sites/default/files/forms/2023%20Transcripts_0.pdf</a>	
525	"In The Matter Of: Athens-Clarke County Board Elections and Registration, March 11, 2020," Mar. 11, 2020, <a href="https://sos.ga.gov/sites/default/files/2022-02/2020_seb.pdf">https://sos.ga.gov/sites/default/files/2022-02/2020_seb.pdf</a>	
526	"In The Matter Of: Secretary of State Board Meeting, February 28, 2020," Feb. 28, 2020, <a href="https://sos.ga.gov/sites/default/files/2022-02/2020_seb.pdf">https://sos.ga.gov/sites/default/files/2022-02/2020_seb.pdf</a>	
527	"In the Matter Of: State Election Board Meeting, August 1, 2023," Aug. 1, 2023, <a href="https://sos.ga.gov/sites/default/files/forms/SEB%208-01-23_BUNDLE.pdf">https://sos.ga.gov/sites/default/files/forms/SEB%208-01-23_BUNDLE.pdf</a>	

PX No.	Document Description	Citation
528	"In the Matter Of: State Election Board Meeting, September 28, 2022," Sept. 22, 2023, <a href="https://sos.ga.gov/sites/default/files/forms/2022%20Transcripts.pdf">https://sos.ga.gov/sites/default/files/forms/2022%20Transcripts.pdf</a>	
529	"11/1/2023 - Senate Committee on Ethics," Nov. 1, 2023, <a href="https://vimeo.com/showcase/9076408?video=868832917">https://vimeo.com/showcase/9076408?video=868832917</a>	
530	"Secretary Raffensperger Continues Focus on Election Security for 2024," Sept. 6, 2023, <a href="https://madmimi.com/p/f406371?pact=162731-175641393-14307111335-60a0fd97a05360e4386c82a31acf06a19d9cd9b4">https://madmimi.com/p/f406371?pact=162731-175641393-14307111335-60a0fd97a05360e4386c82a31acf06a19d9cd9b4</a>	
531	Notice of Change in post-election audit law	Dkt 1673
532	Robert Sinners communications re: Coffee investigation	SINNERS000001-39
533	Exhibit 1, Brown Declaration, Jan. 10, 2023	Dkt. 1629-1
534	Exhibit 2, Brown Declaration, Dec. 4, 2022	Dkt. 1629-1
535	Exhibit 1, Davis Declaration, Dec. 6, 2022	Dkt. 1629-4
536	Exhibit A, DuFort Declaration, Jan. 1, 2022	Dkt. 1629-6
537	Exhibit B, DuFort Declaration, Nov. 1, 2022	Dkt. 1629-6
538	Exhibit C, DuFort Declaration, May 24, 2022	Dkt. 1629-6
539	Exhibit D, DuFort Declaration, May 24, 2022	Dkt. 1629-6
540	Exhibit E, DuFort Declaration, Nov. 3, 2020	Dkt. 1629-6
541	Exhibit F, DuFort Declaration, Nov. 3, 2020	Dkt. 1629-6
542	Exhibit G, DuFort Declaration, Dec. 5, 2022	Dkt. 1629-6
543	Exhibit 17, Hursti Declaration, Sept. 1, 2020	Dkt. 853-2
544	Exhibit 19-A, Marks Declaration, Sept. 1, 2020	Dkt. 853-4
545	Exhibit 19-B, Marks Declaration, Aug. 28, 2020	Dkt. 853-4
546	Exhibit 19-C, Marks Declaration, Sept. 1, 2020	Dkt. 853-4
547	Exhibit 19-D, Marks Declaration, Sept. 1, 2020	Dkt. 853-4
548	Exhibit 1, Marks Declaration, Feb. 12, 2021	Dkt. 1629-8
549	Exhibit 2, Marks Declaration, Feb. 12, 2021	Dkt. 1629-8
550	Exhibit 3, Marks Declaration, Feb. 12, 2023	Dkt. 1629-8
551	Exhibit E, DuFort Declaration, Nov. 3, 2020	Dkt. 1593-5
552	Exhibit F, DuFort Declaration, Nov. 3, 2020	Dkt. 1593-6
553	Exhibit G, DuFort Declaration, Dec. 5, 2022	Dkt. 1593-7

PX No.	Document Description	Citation
554	Exhibit 1, Martin Declaration, Jan. 1, 2020	Dkt. 809-4
555	Exhibit 2, Martin Declaration, Aug. 11, 2020	Dkt. 809-4
556	Exhibit 1, Marks Declaration, Aug. 24, 2020	Dkt. 809-5
557	Exhibit 2, Marks Declaration, May 21, 2020	Dkt. 809-5
558	Exhibit 3, Marks Declaration, Aug. 11, 2020	Dkt. 809-5
559	Exhibit 4, Marks Declaration, Aug. 19, 2020	Dkt. 809-5
560	Exhibit A, DuFort Declaration, Aug. 23, 2020	Dkt. 809-6
561	Exhibit B, DuFort Declaration, June 13, 2020	Dkt. 809-6
562	Exhibit C, DuFort Declaration, Aug. 23, 2020	Dkt. 809-6
563	Exhibit D, DuFort Declaration, Aug. 10, 2020	Dkt. 809-6
564	Exhibit 1, Shirley Declaration, Aug. 11, 2020	Dkt. 809-7
565	Exhibit 2, Shirley Declaration, Aug. 11, 2020	Dkt. 809-7
566	Exhibit 3, Shirley Declaration, Aug. 11, 2020	Dkt. 809-7
567 (old 46)	2019-08-09 State Defs Suppl Notice re New Election System Vendor Contract	Dkt. 575
568 (old 46)	2019-08-09 Ex. A - August 9, 2019 Notice of Award	Dkt. 575-1
569 (old 46)	2019-08-09 Ex. B - August 9, 2019 Certification of the Dominion Voting System for Georgia	Dkt. 575-2
570 (old 131)	State Defs' Supplement to Response to this Court's July 23, 2019 Order	Dkt. 552
571 (old 131)	SOS Notice of Intent to Award	Dkt. 552-1
572 (old 488)	Halderman demonstration video involving Fulton County election equipment	
573 (old 488)	Stillshots of Halderman demonstration video involving Fulton County election equipment	PD1 (9/14/2020 PI Hearing)
574 (old 498)	Short video embedded in 11Alive Staff, <i>Questions raised in timeline of state response to Coffee County breach</i> , 11Alive News (Sep. 26, 2022, 1:44 PM)	
575 (old 498)	Long video embedded in 11Alive Staff, <i>Questions raised in timeline of state response to Coffee County breach</i> , 11Alive News (Sep. 26, 2022, 1:44 PM)	

PX No.	Document Description	Defs.' Objection(s)
1	Harri Hursti, Diebold TSx Evaluation, Security Alert - May 11, 2006, Critical Security Issues with Diebold TSx, BlackBoxVoting.org (May 11, 2006)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401. Plaintiffs' DRE claims have been dismissed and the exhibit does not involve any components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705]. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403.
2	Ariel J. Feldman, J. Alex Halderman, & Edward W. Felten, "Security Analysis of the Diebold AccuVote-TS Voting Machine," in Proc. USENIX/ACCURATE Electronic Voting Technology Workshop (2007)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401. Plaintiffs' DRE claims have been dismissed and the exhibit does not involve any components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705]. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403.



PX No.	Document Description	Defs.' Objection(s)
3	Electronic Voting System Security: Hearing Before the H. Comm. on House Admin., 108th Cong. 99-113, at 107-09 (2004) (statement of Kathy Rogers, Ga. Dir. of Election Admin)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401. Plaintiffs' DRE claims have been dismissed and the exhibit does not involve any components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705]. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403.
4	Presentation titled "The Georgia Voting System," presented by Merle S. King, Kennesaw State University, Center for Election Systems, dated February 2014	Defendants object to this exhibit on the basis of relevance. F.R.E. 401. Plaintiffs' DRE claims have been dismissed and the exhibit does not involve any components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705]. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403.
5	STATE-DEFENDANTS-00000409	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802



PX No.	Document Description	Defs.' Objection(s)
6	FOIA Aug. 29, 2016 Email Chain	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
7	FOIA Mar. 16-17, 2017 Email Chains	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
8	FedEx Notice of Complaint	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
9	FOIA July 7, 2017 Email Chain	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
10	Notice of Removal	
11	FOIA Aug. 9, 2017 Email Chain	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
12	State Defs' Response re Spoliation of Evidence	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
13	Frank Bajak, Georgia election server wiped after suit filed, AP News (Oct. 26, 2017)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
14	Jan. 8, 2020 Decl. of J. Alex Halderman, Ph.D. with Appx. A: Matthew Bernhard et al., Can Voters Detect Malicious Manipulation of Ballot Marking Devices?, Univ. of Mich. (2020)	
15	Ledford Dep. Ex. 6 – KSU CES Instructions re GEMS	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403. Plaintiffs' claims related to the prior voting system have been dismissed and the exhibit does not involve components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705].
16	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 1 - 2022.10.10 Joint Pls.' 7th Am. 30b6 Deposition Notice to Ga. Sec'y of State's Office	

PX No.	Document Description	Defs.' Objection(s)
17	Ex. C - Feb 2018 Fortalice Report	
18	Ex. A - Oct 2017 Fortalice Report	
19	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 3 - FORTALICE003692 (Aug. 25, 2020 Draft Technical Assessment (13 pgs))	
20	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 14 - STATE-DEFENDANTS-00126614	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it, or portions thereof, constitutes hearsay. F.R.E. 802
21	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 15 - STATE-DEFENDANTS-00126678	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it, or portions thereof, constitutes hearsay. F.R.E. 802
22	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 17 - STATE-DEFENDANTS-00182161	
23	July 30, 2019 State Defs.' Response to Court Questions	
24	Oct. 25, 2019 Brief ISO State Defs.' Motion to Dismiss	
25	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 18 - STATE-DEFENDANTS-00182171 (2020 Rule 590-8.3 Attestation)	

PX No.	Document Description	Defs.' Objection(s)
26	Nov. 23, 2021 State Defs.' Responses to Curling Pls.' Requests for Admission (Response No. 65)	
27	Ledford Dep. Ex. 7	Defendants object to this exhibit because significant portions are unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
28	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 16 STATE-DEFENDANTS-00153091	
29	Dominion027284	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
30	STATE-DEFENDANTS-00101382	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds

PX No.	Document Description	Defs.' Objection(s)
		that portions of it contain hearsay, F.R.E. 802.
31	STATE-DEFENDANTS-00158640	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
32	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 29 - STATE-DEFENDANTS-00158823	
33	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 4 - Dominion001889	

PX No.	Document Description	Defs.' Objection(s)
34	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 12 - STATE-DEFENDANTS-00124842	Defendants object to this exhibit on the basis of relevance (F.R.E. 401); Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time (F.R.E. 403); Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay (F.R.E. 802).
35	Hamilton Dep. Ex. 18 - FORTALICE001163	Defendants object to this exhibit on the basis of relevance (F.R.E. 401); Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time (F.R.E. 403); Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay (F.R.E. 802).
36	Hamilton Dep. Ex. 14 - STATE-DEFENDANTS-00171971	
37	Hampton Dep. Ex. 22 (still shots captured from Misty Hampton YouTube video)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
38	Hampton Dep. Ex. 23 (image from the Coffee County Elections Office produced by Paul Maggio)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802

PX No.	Document Description	Defs.' Objection(s)
39	Hampton Dep. Ex. 24 (still shot of password on paper placed on a desktop computer)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
40	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 2 (Sept. 28, 2021 report of Coffee County investigation)	
41	Ex. A to Plaintiffs' Joint Notice of Filing Additional Evidence in Support of Renewed Motions for Attorneys' Fees and Expenses	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
42	Rev.com, Inc., Georgia Secretary of State Brad Raffensperger Press Conference Transcript: Announces Hand Recount (Nov. 11, 2020)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
43	Jan. 10, 2019 Secure, Accessible & Fair Elections (SAFE) Commission Report, submitted to the Ga. General Assembly	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
44	Aug. 28, 2019 Joint Discovery Statement Regarding Production of FBI Server Image	Defendants object to this exhibit on the basis of relevance (F.R.E. 401); Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time (F.R.E. 403); Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay (F.R.E. 802).
45	Ga. Sec'y of State, Security-Focused Tech Company, Dominion Voting to Implement new Verified Paper Ballot System (July 29, 2019)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.



PX No.	Document Description	Defs.' Objection(s)
46	Intentionally Left Blank	
47	Dominion Contract (Cross Decl. Ex. 2 ISO Curling Plaintiffs' Motion for Preliminary Injunction)	
48	Oct. 12, 2022 SOS 30b6 Sterling Dep. Ex. 4 (tweet by Gabriel Sterling)	Defendants object to this exhibit because it is unauthenticated; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
49	Wenke Lee Article (Jan. 3, 2019)	Defendants object to the extent Plaintiffs seek to qualify the witness as an expert and admit the exhibit as an expert report. F.R.C.P. 26(a)(2)(D); L.R. 26.2.
50	Richard A. DeMillo, Robert S. Kadel & Marilyn R. Marks, What Voters are Asked to Verify Affects Ballot Verification: A Quantitative Analysis of Voters' Memories of Their Ballots (Apr. 11, 2019)	Defendants object to the extent Plaintiffs seek to introduce the exhibit as an expert report. F.R.E. 702.

PX No.	Document Description	Defs.' Objection(s)
51	Gilbert Dep. Ex. 2 - University of Georgia School of Public & International Affairs, Georgia Voter Verification Study (Jan. 22, 2021)	Defendants object to this exhibit because it is unauthenticated; Defendants object to the extent Plaintiffs seek to introduce the exhibit as an expert report, FRE 702; the exhibit contains impermissible opinion testimony, FRE 701; and Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403.
52	Jan. 7, 2019 Experts Letter to SAFE Commission	Defendants object to this exhibit because it is unauthenticated; Defendants object to the extent Plaintiffs seek to introduce the exhibit as an expert report, FRE 702; the exhibit contains impermissible opinion testimony, FRE 701; and Defendants object because the letter constitutes inadmissible hearsay, FRE 801, 802. Lastly, the citation is to the entire Motion for Preliminary Injunction, Dkt. 419-1, whereas the letter to the SAFE Commission is specifically located at page 426.

PX No.	Document Description	Defs.' Objection(s)
53	ELECTIONS_00000143	Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403.
54	July 1, 2021 Coalition Plaintiff's Expert Disclosures – Opening Reports, along with excerpt of Supplemental Decl. of Harri Hursti, dated Sept. 1, 2020, and excerpt of Decl. of Philip B. Stark, dated Sept. 9, 2018	Defendants object because the exhibit contains substantial portions of irrelevant content outside the scope of the issues for trial. FRE 401. Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403.

PX No.	Document Description	Defs.' Objection(s)
55	Ben Adida Twitter (Oct. 1, 2022) ("my ideal voting model is one where voters get to choose BMD or hand marked")	Defendants object because the cited portion of the tweet is incomplete. FRE 106. The tweet states in full, "And again, my ideal voting model is one where voters get to choose BMD or hand marked, where audits happen regularly, and where machines are maximally transparent and use modern security features." Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.

PX No.	Document Description	Defs.' Objection(s)
56	Ben Adida Twitter (Feb. 20, 2020) ("RLAs never confirm outcomes on their own")	<p>Defendants object because the cited portion of the tweet is incomplete. FRE 106. The tweet states in full, "RLAs never confirm outcomes on their own. Not for BMDs, not for handmarked paper ballots. They confirm that tabulation was done correctly."</p> <p>Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802.</p> <p>Defendants object because the exhibit is impermissible improper/unsupported opinion testimony, FRE 701.</p> <p>Defendants object for lack of foundation, FRE 602. Lastly, Defendants object to this exhibit because it is unauthenticated.</p>
57	Verified Voting's Election Day Equipment map, Verified Voting, Election Day Equipment (Data from November 2022)	<p>Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802.</p> <p>Defendants object for lack of foundation, FRE 602.</p> <p>Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.</p>

PX No.	Document Description	Defs.' Objection(s)
58	Written Testimony of Marian K. Schneider, President of Verified Voting, to Allegheny Cnty. Bd. of Elections, Public Meeting on Purchase of Voting Systems (June 7, 2019)	Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Defendants object because the exhibit is impermissible improper/unsupported opinion testimony, FRE 701. Lastly, Defendants object because the exhibit is not relevant, FRE 401.
59	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 21 - Dominion044536	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.

PX No.	Document Description	Defs.' Objection(s)
60	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 9 - STATE-DEFENDANTS-00172679 (Email re issues with Fulton County Batch Tally Sheets)	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.
61	Jan. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 23 - Nov. 17, 2021 Kemp Ltr to SEB re 2020 RLA Report	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.

PX No.	Document Description	Defs.' Objection(s)
62	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 15 – Dominion073354	Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403.
63	Dr. Juan Gilbert's Patent No. US 11, 036, 442 B2 for "Transparent Interactive Printing Interface"	Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.



PX No.	Document Description	Defs.' Objection(s)
64	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 5 – STATE- DEFENDANTS-00108789	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
65	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 6 – STATE- DEFENDANTS-00110732	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
66	E-mail string from Ryan Germany to Frances Watson and Chris Harvey re Polling Machine Issues	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
67	Dominion043450	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
68	Dominion043452	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
69	Dominion042793	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
70	Dominion043377	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
71	Dominion043484	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
72	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 16 – Dominion043437	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
73	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 18 - STATE-DEFENDANTS-001 04453	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
74	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 5 (State Defs.' objections and responses to Curling Pls.' first set of interrogatories)	Defendants object because portions of the exhibit are not relevant, FRE 401. Defendants further object on the same bases as the objections asserted by Defendants within the exhibit.

PX No.	Document Description	Defs.' Objection(s)
75	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 6 (State Defs.' objections and responses to Curling Pls.' second set of interrogatories)	Defendants object because portions of the exhibit are not relevant, FRE 401. Defendants further object on the same bases as the objections asserted by Defendants within the exhibit.
76	Curling Plaintiffs' joint discovery statement regarding State Defendants' responses to Curling Plaintiffs' second set of interrogatories and CISA request	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
77	Oct. 21, 2021 State Defs' Response to Revised Interrogatories	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
78	J. Barnes Dep. Ex. 6 - May 2021 Email re CyberNinjas	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
79	State Defendants' Motion to Seal Halderman Report	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
80	PD1 - Halderman video stills	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
81	PX02 - Side-by-side of Ballots from system hack	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
82	PX03 - Scanner Results of Photocopied Ballots	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
83	STATE-DEFENDANTS-00047579	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.



PX No.	Document Description	Defs.' Objection(s)
84	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 5 - Interview by Atlanta Press Club with Brad Raffensperger, Sec'y of State, GA (Feb. 10, 2022)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
85	Ga. Sec'y of State's announcement: Secretary Raffensperger Calls on J. Alex Halderman to Agree to Release "Secret Report" and Pre-Election Testimony (Jan. 27, 2022)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
86	Jan. 20, 2022 statement of interest explaining the vulnerability disclosure program operated by the U.S. Department of Homeland Security	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
87	Notice by CISA regarding CVD process and its timeline	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
88	CISA's 90-day status report updating the Court and the parties on the final steps of CISA's coordinated vulnerability disclosure process	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
89	CISA's ICS advisory, U.S. Dep't of Homeland Security, Cybersecurity & Infrastructure Security Agency, Vulnerabilities Affecting Dominion Voting Systems ImageCast X, ICS Advisory No. ICISA-22-154-01 (June 3, 2022)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
90	CISA's 30-day report on CISA's CVD process	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
91	CISA's 60-day status report on CISA's CVD process	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
92	Wenke Lee Article (Oct. 8, 2018)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
93	Nov. 17, 2021 Halderman Dep. Ex. 5 – Aug. 31, 2021 Decl. of J. Alex Halderman, Coomer v. Donald J. Trump for President, No. 2020cv034319 (Dist. Ct. Denver Cnty. Colo.)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
94	FORTALICE000124 - Apr. 9, 2021 Fortalice Technical Assessment	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
95	November 2018 Fortalice Report	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
96	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 10 - FORTALICE000625	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
97	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 1 - FORTALICE003593	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
98	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 2 - FORTALICE003807	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
99	July 14, 2021 email from Meghan Aubry (Fortalice) to Adam Sparks	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
100	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 4 – STATE-DEFENDANTS-00101460	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
101	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 25 – STATE DEFENDANTS-00178061	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
102	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 5 - STATE-DEFENDANTS-00101471	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.



PX No.	Document Description	Defs.' Objection(s)
103	Feb. 11, 2022 SOS 30b6 (M. Barnes) Ex. 7 - STATE-DEFENDANTS-00158505	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
104	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 22 - STATE-DEFENDANTS-00157919	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
105	STATE-DEFENDANTS-00161382	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
106	ELECTIONS_00000330 (Nov. 20, 2020 email sent from Dwight Bower to Richard Barron, Derrick Gilstrap, and Timothy Cummings)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
107	The White House, Notice on the Continuation of the National Emergency With Respect to Foreign Interference In or Undermining Public Confidence in United States Elections (Sept. 7, 2022)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
108	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 24 - STATE-DEFENDANTS-00182284	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
109	Jan. 28, 2022 SOS 30b6 (Harvey) Ex. 11 - STATE-DEFENDANTS-00139190	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
110	Misty Hampton Messages with Eric Chaney (Full - 24 pages total)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
111	"Text Messages.pdf" produced by Misty Hampton	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
112	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 10 - Coffee County Exterior Surveillance Video still shots (Jan. 7)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
113	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 11 - Coffee County Exterior Surveillance Video still shots (Jan. 8)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
114	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 8 - Maggio 08122022-000034	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
115	SullivanStrickler - Log of IP addresses that have downloaded CC Data	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
116	Minute Sheet for proceedings held in Open Court, Pearson et. al v. Kemp et al, No. 1:20-cv-04809-TCB (N.D. Ga. Dec. 7, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
117	Coffee County BOE 30b6 (Stone) Dep. Ex. 7 – Coffee County Surveillance Video still shots of Jeffrey Lenberg (Jan. 27-29)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
118	Coffee County BOE 30b6 (Stone) Dep. Ex. 8 - Coffee County Surveillance Video still shots of Jeffrey Lenberg & Doug Logan (Jan. 18-19)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
119	Lenberg Dep. Ex. 5 (Coffee County ICC & ICP Reports)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
120	Lenberg Dep. Ex. 10 (Misty Hampton preparing thumb drive for Jeffrey Lenberg)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
121	Jan. 7, 2023 Halderman Supplemental Decl. re Coffee County	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
122	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 21 (email chain, dated July 27, 2022, between Bruce Brown and Josh Belifante)	Defendants object to this exhibit because its attachment is unauthenticated and further object because counsel is not competent to testify; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
123	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 18 (Mike Lindell Flight)	Defendants object to this exhibit because its attachment is unauthenticated and further object because counsel is not competent to testify; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.



PX No.	Document Description	Defs.' Objection(s)
124	Coffee County BOE 30b6 (Stone) Dep. Ex. 16 (Feb. 25, 2021 letter from Jil Ridlehoover to Coffee County BOE)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit as hearsay to the extent offered for its truth, F.R.E. 802.
125	Coffee County BOE 30b6 (Stone) Dep. Ex. 17 (Feb. 25, 2021 letter from Misty Hampton to Coffee County BOE)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit as hearsay to the extent offered for its truth, F.R.E. 802.
126	Excerpt of Ed Voyles production file, which contains a Feb. 24, 2021 text message thread between Ed Voyles and Misty Hampton	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit as hearsay to the extent offered for its truth, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
127	FORTALICE001658 - Feb. 26, 2021 Evidence Collection Protocol	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants further object on the basis of the confidentiality designation and stipulated protective order in this case
128	Ga. Sec'y of State, Raffensperger to Replace Coffee County Election Equipment, End Distraction for Local Election Officials (Sept. 23, 2022)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
129	Sept. 23, 2022 State Defendants Notice Regarding Coffee County Equipment	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
130	Coffee County Acceptance Testing Documents	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403

PX No.	Document Description	Defs.' Objection(s)
131	Intentionally Left Blank	
132	Email thread from Sept. 26, 2022 between David Cross, Bruce Brown, and Bryan Tyson	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802; Improper Opinion Testimony By Lay Witness, FRE 701; counsel not competent to testify
133	Jan. 16, 2023 Email from B. Tyson to R. Abney and C. Middleton	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
134	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 8 - Letter to GBI	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing,

PX No.	Document Description	Defs.' Objection(s)
		distracting, or a waste of time, F.R.E. 403
135	State Defendant's Brief re Investigative Privilege	Defendants object to this exhibit on the basis of relevance, F.R.E. 401
136	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 11 - SOS-INV000048	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
137	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 13 - SOS-INV000060	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
138	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 14 - SOS-INV000014	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
139	SOS-INV000041	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
140	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 17 (Coffee County surveillance video still shots)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
141	SOS, Logan and Lenberg's surveillance video still shots	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
142	Sinners Dep. Ex. 5 - Harry MacDougald's 45-minute call with Marilyn Marks	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802

PX No.	Document Description	Defs.' Objection(s)
143	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 29 - STATE-DEFENDANTS-00101937 (Dominion Notice to Counties)	
144	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 3 (password on post-it at the base of a monitor)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
145	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 7 - SOS-INV0000007	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
146	11Alive Staff, Questions raised in timeline of state response to Coffee County breach, 11Alive News (Sep. 26, 2022, 1:44 PM)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
147	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 6 - The Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022), YouTube (May 9, 2022)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
148	SOS-INV000144 (SEB case list)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
149	Ga. Sec'y of State, Secretary Raffensperger Calls on Department of Justice to Investigate Allegation of Fulton County Shredding Applications (Oct. 11, 2021)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
150	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 4 - Université de Genève (UNIGE), How to safeguard democracy? A look back at the last American presidential election. Gabriel Sterling, YouTube (Oct. 4, 2021, uploaded Nov. 25, 2021)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
151	August 2020 State Defs.' Opp. to Curling Pls.' Preliminary Injunction Motion	
152	ELECTIONS_00000091	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.
153	ELECTIONS_00000127	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.
154	ELECTIONS_00000194	Defendant objects to this exhibit because it constitutes hearsay. FRE 802. Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant objects to this exhibit because it is unauthenticated.
155	ELECTIONS_00000198	Defendant objects to this exhibit because it constitutes hearsay. FRE 802. Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant objects to this exhibit because it is unauthenticated.
156	ELECTIONS_00000189	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.



PX No.	Document Description	Defs.' Objection(s)
157	Jan. 21, 2022 Fulton Cnty 30b6 (Gilstrap) Dep. Tr. Ex. 7 - STATE-DEFENDANTS-00169113	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendant objects to this exhibit because it constitutes hearsay. FRE 802.
158	Coffee County BOE 30b6 (Stone) Dep. Tr. Ex. 3 - Coffee County Surveillance Video Still Shots	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
159	Updated January 7, 2021 Coffee County Surveillance Video Still Shots	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
160	Ben Adida Twitter (October 2, 2022) (HMPB + 1 BMD)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
161	September 2018 Wenke Lee Presentation	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
162	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 19 - Maggio 08122022-000098 (FedEx Shipping Requests & Labels)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
163	Chaney Dep. Ex. 4—STATE-DEFENDANTS 0020100 (SEB2020-250 Investigation Report)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
164	Lindsey Dep. Ex. 6 - The Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022), YouTube (May 9, 2022)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
165	Georgia's 2022 Statewide Risk Limiting Audit Confirms Results _ Georgia Secretary of State (Feb. 10, 2023).	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
166	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 12 - All Photos - Maggio 08122022-000236 to 265	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
167	October 2022 State Defs.' Opp to Coalition Pls.' Emergency	

PX No.	Document Description	Defs.' Objection(s)
	Motion for Relief re Protective Order	
168	July 20, 2022 Ryan Germany Email re Interview CC	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
169	February 2021 State Defs.' Brief re Standing	
170	August 2020 Fulton Cnty Opp. to Curling Pls.' Preliminary Injunction Motion	
171	November 2019 State Defs.' Reply ISO MTD Pls.' Amended Complaints	
172	October 2017 Fulton Cnty Defs.' Reply ISO Motion to Dismiss	
173	June 2022 Ex. A—December 2021 SEB Hearing Transcript-Coffee County Portion	

PX No.	Document Description	Defs.' Objection(s)
174	Andrew W. Appel et. al., Ballot-Marking Devices (BMDs) Cannot Assure the Will of the Voters, Election L. J., 20 (Feb. 14, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
175	Fulton Cnty Response to Coalition Pls 2nd RFA	
176	Email re 2nd follow-up requesting documents	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
177	August 2017 State Defs' Brief ISO MTD	
178	September 2022 State Defs.' Notice of Conditional Objection to September 9 Proceeding.	

PX No.	Document Description	Defs.' Objection(s)
179	Greg Freemyer—Combined Posts	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
180	Dec. 12, 2018 SAFE Commission Tr.	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendant's further object to this exhibit as no line numbers or pages are used.
181	SOS-INV000053	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
182	SOS-INV000087	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
183	Monday, 11-16-20 19:24 UTC Message # 155, from Hampton, to Voyles, Subject: ORR	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
184	4-25-22 Printout of Case Sheet for SEB2020-250-Coffee County Misc	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
185	Coffee County surveillance video interior still shots (Jan. 7) - 62 images	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
186	SOS-INV000103	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
187	RollingStone: Pro-Trump Georgia Officials Plotted to Swipe Voting Data. We Caught Them.	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.



PX No.	Document Description	Defs.' Objection(s)
188	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 25 - Chris Harvey SOS Notice to Counties re ORR for election software	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
189	SOS Press Release: Secretary of State's Office Opens Investigation into Coffee County's Handling of Recount	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
190	10102022-000141	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
191	DOJ Ltr to Karen Fann (President of Arizona State Senate) re Maricopa County audit and Cyber Ninjas	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
192	SOS Press Release: The MITRE Corporation, an Independent Federal Lab, finds Georgia Election System Secure	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
193	Executive Summary - July 2022 MITRE Report	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
194	Email chain with Michael Barnes, Blake Evans, and others	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
195	Gabe Sterling LinkedIn	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
196	Excerpted pages of "Integrity Counts" by Brad Raffensperger	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
197	Nov. 23, 2021 State Defs.' Responses to Curling Pls.' Requests for Admission	
198	STATE-DEFENDANTS-00113751	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
199	STATE-DEFENDANTS-00169353	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds

PX No.	Document Description	Defs.' Objection(s)
		that portions of it contain hearsay, F.R.E. 802.
200	STATE- DEFENDANTS-00192602	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
201	Audio Recording - Scott Hall	Defendant objects to this exhibit because it constitutes hearsay. FRE 802. Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant objects to this exhibit because it is unauthenticated.
202	STATE-DEFENDANTS-11151729	Defendant objects to this exhibit on the basis of relevance. FRE 401.
203	Dominion Voting brochure re: Mobile ballot printing	Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant objects to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
204	Ga. Code Ann. § 21-2-498. Precertification tabulation audits; rules and regulations; risk-limiting audit pilot program	Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant objects to this exhibit because it is unauthenticated.
205	Rule 183-1-15-.04 Audit	Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant objects to this exhibit because it is unauthenticated.
206	Arlo instructions re ballot manifest	Defendant objects to this exhibit because it is unauthenticated.
207	CGG06SterlingDeKalbBatchSheetsListOfficialArlowithCGGtotal_XLS.xlsx	
208	Kemp Ltr to SEB re analysis of inconsistencies with Fulton County 2020 Risk-Limiting Audit Report (RLA)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
209	DeKalb County Audit Board Batch Sheet 0262	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
210	DeKalb County Audit Board Batch Sheet 0260	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this

PX No.	Document Description	Defs.' Objection(s)
		exhibit on the basis of relevance. FRE 401.
211	DeKalb County Audit Board Batch Sheet 0140	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
212	DeKalb County Audit Board Batch Sheet 0117	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
213	DeKalb County Audit Board Batch Sheet 0104	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
214	Senator Walker & Rep. Blackmon Ltr to SEB re Kemp's report re 2020 Risk-Limiting Audit Report	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
215	Fox5Atlanta: Software glitch causes delay counting thousands of votes in Gwinnett County	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
216	Whittier Daily News: A behind the scenes look at Georgia's vote-counting	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
217	Defendants Secretary of State Brad Raffensperger, State Election Board, and State Election Board Members' Response to Order Dated April 16, 2019	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.
218	CGG's ORR to Jeff Milsteen, KSU (190pgs of material)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
219	Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 12.4 Challenge Board	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.
220	Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 2.3 Deleting a Database	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.



PX No.	Document Description	Defs.' Objection(s)
221	Ballot image printout from GEMS computer	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
222	Ballot image report from a GEMS computer	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
223	Handwritten note about Fulton precinct	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
224	Direct Record Electronic Voting Machine Recap records	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
225	Photo of machine serial numbers of DRE machines	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
226	USA vs. Netyksho, et al. Indictment	Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant also objects to this exhibit on the grounds that it would cause undue prejudice and confuse the issues in the case. FRE 403.
227	Russian Targeting of Election Infrastructure During the 2016 Election: Summary of Initial Findings and Recommendations, May 8, 2018	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant also objects to this exhibit on the grounds that it would cause undue prejudice and confuse the issues in the case. FRE 403.
228	"Who, What, Why" article titled "Kemp's Aggressive Gambit to Distract from Election Security Crisis."	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant also objects to this exhibit on the grounds that it would cause undue prejudice and confuse the issues in the case. FRE 403.

PX No.	Document Description	Defs.' Objection(s)
229	SOS Press Release: After Failed Hacking Attempt SOS Launches Investigation into Georgia Democratic Party	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant also objects to this exhibit on the grounds that it would cause undue prejudice and confuse the issues in the case. FRE 403.
230	Michael Barnes LinkedIn	Defendant objects to this exhibit on the basis of relevance. FRE 401.
231	Michael Barnes LinkedIn	Defendant objects to this exhibit on the basis of relevance. FRE 401.
232	Dominion017810	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
233	STATE-DEFENDANTS-00157766	Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
234	STATE-DEFENDANTS-00158494	Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
235	STATE-DEFENDANTS-00157783	Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
236	Dominion042072	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
237	Dominion042114	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
238	Dominion042575	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
239	Dominion042641	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
240	Dominion042793	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
241	Dominion043491	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
242	Dominion043648	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
243	Dominion043765	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
244	Aug. 4, 2020 Email Chain from Rick Barron	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
245	STATE-DEFENDANTS-00161074	Defendant objects to this exhibit on the basis of relevance. FRE 401.
246	STATE-DEFENDANTS-00127945	Defendant objects to this exhibit on the basis of relevance. FRE 401.
247	Dominion069731	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
248	Chris Harvey LinkedIn	Defendant objects to this exhibit on the basis of relevance. FRE 401.
249	STATE-DEFENDANTS-00108321	Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this evidence on the basis that it would cause undue prejudice. FRE 403
250	STATE-DEFENDANTS-00108787	Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this evidence on the basis that it would cause undue prejudice. FRE 403

PX No.	Document Description	Defs.' Objection(s)
251	STATE-DEFENDANTS-00110230	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
252	STATE-DEFENDANTS-00115480	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
253	STATE-DEFENDANTS-00117430	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
254	FORTALICE001209	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
255	Dominion069648	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
256	Dominion072216	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
257	Dominion074766	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
258	Dominion074784	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
259	Dominion076086	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.



PX No.	Document Description	Defs.' Objection(s)
260	STATE-DEFENDANTS-00200997	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
261	STATE-DEFENDANTS-00165630	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
262	§ 21-2-379.22	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
263	Photo by Chris Aluka Berry (Reuters) "People cast their ballots during early voting for the presidential elections at State Farm Arena in Atlanta, Ga., October 12, 2020"	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
264	Secure the Vote: Precinct Layout to Aid with Privacy Training	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
265	Dec. 1, 2020 - Chris Harvey Official Election Bulletin re "Preserving Ballot Images and Delivering to Sec. of State"	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
266	Excerpt of Rockdale000924 (with highlighting added)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
267	Curling Plaintiffs' Third Amended Notice of Deposition of Fulton County Defendants	
268	E-mail string from Scott Tucker to Blake Evans re Two ballots printing	Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
269	E-mail string from Chris Harvey to Richard Barron re Fulton County - Machines Down and Polling Places Not Open	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
270	E-mail string from Blake Evans to Richard Barron & others re Elections complaint from Thomas Elliott	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
271	E-mail string from Richard Barron to Brigitte Bailey, Gabriel Sterling and Dwight Brower re Fulton Advance Voting Issue	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
272	E-mail string from Richard Barron to Julie Houk and Ryan Germany re Urgent demands to send corrected absentee ballots to Fulton Co. Voters...	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
273	12-14-18, E-mail from Richard Barron to list re Voting system input from Fulton County, and 1-3-19 E-mail from Joseph Kirk to list re My thoughts about our next voting system	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
274	E-mail string from Gabriel Sterling to Chris Harvey re Fulton County ExpressPolls	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
275	Seven Hills Strategies report re State Election Board	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
276	Seven Hills Strategies report re State Election Board - Post-Election Executive Summary	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
277	Merritt Beaver LinkedIn	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
278	Email chain re action items for the Air Gap Elections Center Network	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
279	Email chain re Dominion tech on the Gwinnett video used a flash drive on a laptop connected to E-Net	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
280	Information Technology Security Program Charter	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
281	July 2020 Email re Statement of Work & Rules of Engagement with Fortalice	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
282	Email chain re threat "I bet I can hack your electronic voting machines."	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
283	Email from Dave Hamilton to Merritt Beaver re Risk Register and attaching "SOS - Remediation Task List v13.1.xlsx"	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
284	SOS - Remediation Task List v13.1.xlsx	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
285	Alert re ransomware infection affecting Jekyll Island Authority	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
286	July 10, 2020 Rules of Engagement (Fortalice & GA SOS)	
287	Email chain from Dave Hamilton re TeamViewer	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
288	Email chain re BMDs not reading the cards	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
289	Email chain between IT department and Civix re Latest Version of Open Issues Tracking	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
290	Email chain re security vulnerabilities identified in PCC scan from Fortalice	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
291	Email chain re Election Center - Infrastructure Server - Proposed changes	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
292	FORTALICE003625 (Aug. 25, 2020 Draft Technical Assessment (15 pgs))	Defendants object to this exhibit because it is unauthenticated; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
293	FORTALICE003678 (Aug. 25, 2020 Draft Technical Assessment (14 pgs))	Defendants object to this exhibit because it is unauthenticated; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
294	FORTALICE000650 (Nov. 25, 2020 Fulton County Laptop Forensic Review)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit because it is unauthenticated; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
295	Curling Plaintiffs' Fifth Amended Notice of Deposition of Office of the Secretary of State	
296	David Hamilton LinkedIn	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
297	Email from Logan Lamb to Merle King, later forwarded to Michael Barnes re KSU server	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
298	Fortalice Task Order re Incident Response Support	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
299	Fortalice Status Updates	Defendants object to this exhibit because it is unauthenticated; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
300	Email from Dave Hamilton re Potential leakage of voter data	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
301	CBS Atlanta article "UPDATE: Ransomware Attackers Hit Hall County Election Infrastructure"	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
302	Email chain re Election Center Visit Notes and enclosing "SOS - Site Visit.docx"	
303	SOS - Site Visit.docx	
304	Email from Dave Hamilton re encryption	
305	Email chain re CyberSecurity Incident Response Plan	
306	Curling Pls Doc Subpoena to Eric Chaney	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
307	Coalition Pls Doc Subpoena to Eric Chaney	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
308	Chaney Response to Coalition Pls Doc Subpoena	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.



PX No.	Document Description	Defs.' Objection(s)
309	Dec. 10, 2020 Letter to House Governmental Affairs Committee	Defendants object to this exhibit as hearsay, F.R.E. 802.
310	Email chain with Emma Brown (WaPo), Jennifer Herzog & Eric Chaney denying Coffee County breach	Defendants object to this exhibit as hearsay, F.R.E. 802.
311	Robert A. Sinners LinkedIn	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
312	Shawn Still v. Raffensperger Complaint	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
313	"TLP: White" Version of CISA's ICS advisory, U.S. Dep't of Homeland Security, Cybersecurity & Infrastructure Security Agency, Vulnerabilities Affecting Dominion Voting Systems ImageCast X, ICS Advisory No. ICSA-22-154-01 (June 3, 2022)	Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
314	"TLP: Red" Version of CISA's ICS advisory, U.S. Dep't of Homeland Security, Cybersecurity & Infrastructure Security Agency, Vulnerabilities Affecting Dominion Voting Systems ImageCast X, ICS Advisory No. ICSA-22-XXX-0X (STATE-DEFENDANTS-00202234-38)	Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
315	Letter enclosing BC0001-0008	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
316	Mark Niesse, Pro-Trump tech team copied Georgia election data, record show, Atlanta-Journal Constitution	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
317	Coffee County BOE 30b6 (Stone) Dep. Ex. 2 – Coffee County Surveillance Video still shots of Eric Chaney (Jan. 7 & 8)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
318	Collection of CC BOE Monthly Board Meeting Minutes (25 pgs)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
319	Eric Chaney Resignation from CC BOE	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
320	Emails re Misty Hampton's ORR request for the surveillance videos & timesheets	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
321	SullivanStrickler Engagement Agreement with Jesse Binnall ("subsequent work in the State of Georgia")	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
322	Dominion089393	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
323	Declaration of Jeffrey E. Lenberg re Election Integrity Investigations August 2020 through October 2022	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
324	"Coffee_Messages.pdf" produced by Doug Logan on 11/10/22	Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
325	"12. Coffee & Pierce Cty Records Requests.pdf" produced by Jeffrey Lenberg on 11/19/22	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
326	Jan 27 & 29, 2021 Lenberg surveillance video still shots (re ring light)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
327	Jan 18-19, 2021 Lenberg surveillance video still shots (exterior arrival & exit times)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
328	Jan. 27, 2021 ORR request from Jeff Lenberg to Misty Hampton re thumb drive	Defendants object to this exhibit as hearsay, F.R.E. 802.
329	Oct. 27, 2021 Email from Charles Dial re Misty Hampton email recovery	Defendants object to this exhibit as hearsay, F.R.E. 802.
330	Misty Hampton Messages with "Gary W Diminon" (Full - 13 pages total)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
331	Jan 7 surveillance video still shot (Cathy Latham in Interior) - 1 image	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
332	Jan 7 surveillance video still shot (interior) - 8 images	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
333	DouglasNow Article "Board of Elections accepts employee resignations, election office temporarily closed"	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
334	Stillshot of Jil Ridlehoover in DouglasNow "Dominion Voting Machine Flaws" YouTube Video 2	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
335	Stillshot of Ed Voyles, Wendell Stone, and Diana (Misty's daughter) in DouglasNow "Dominion Voting Machine Flaws" YouTube Video 2	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
336	Stillshot of Matthew McCullough in DouglasNow "Dominion Voting Machine Flaws" YouTube Video 2	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
337	CES Memos to Coffee County enclosing EMS passwords for elections (as copied by SullivanStrickler team)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403.
338	Text Messages produced by Doug Logan re Coffee County trip	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
339	Excerpt of SullivanStrickler - Log of email addresses that have access to CC Data	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403.
340	Screenshot from drive produced by Doug Logan (screenshot created by CGG expert)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
341	Headshot of Jennifer Jackson	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
342	Headshot of Karuna Naik	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
343	Headshot of Paul Maggio	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
344	SullivanStrickler Engagement Agreement with Sidney Powell (Michigan work)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
345	Text Messages produced by Paul Maggio (one with Cathy Latham, one with Scott Hall)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
346	Folder Tree of data produced by SullivanStrickler "SSA1722 HARD DRIVE CONTENTS" (doc created by K&H)	
347	Email from Jennifer Jackson to Paul Maggio, Greg Freemyer, and Karuna Naik enclosing "SSA 1722 Coffee County.xlsx"	
348	SSA 1722 Coffee County.xlsx	

PX No.	Document Description	Defs.' Objection(s)
349	Defending the Republic, Inc. check made out to SullivanStrickler for \$26,220.64"	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
350	Email chain (Favorito, Voyles, Hampton, Latham, Marks) forwarding Chris Harvey SOS Notice to Counties re ORR for election software	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
351	Jan 7 Surveillance video still shots (with Ed Voyles)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
352	Jan 7 Surveillance video still shots (Ed Voyles carrying in scanner)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
353	March 8-9, 2021 Marilyn Marks text messages with Ed Voyles	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
354	Curling Pls' Subpoena to Latham	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
355	CGG Subpoena to Latham and Ex. 1 (Draft Executive Orders - Dec 16 & 17 versions)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
356	Dec. 23, 2020 Dominion's Notice of Obligation to Preserve Documents to Cathy Latham	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
357	Draft Executive Order "Presidential Findings to Preserve Collect and Analyze National Security Information Regarding the 2020 General Election	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
358	Jan. 6, 2021 Email from Misty Hampton to Scott Hall enclosing "ICC LOG.txt" and "slog.txt"; Scott Hall forwards to "x0250r0ll@protonmail.com	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
359	Jan. 7 Surveillance video still shots of Alex Cruce	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.
360	Article entitled "Why computer scientists prefer paper ballots"	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
361	Gilbert Twitter	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
362	Nov. 8, 2019 Engagement Letter between GA SOS & SEB and Dr. Juan Gilbert	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.



PX No.	Document Description	Defs.' Objection(s)
363	Excerpt of Gusciora v. Corzine, Mar. 24, 2009 Trial Tr. (Dr. Shamos)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
364	Donna Curling ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
365	Donna Price ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
366	Jeffrey Schoenberg ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
367	Schoenberg Absentee ENET Report	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
368	Laura Digges ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
369	William Digges ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.



PX No.	Document Description	Defs.' Objection(s)
370	Ricardo Davis ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
371	Megan Missett ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
372	Redacted GBI Report	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
373	S. Ellis letter to V. Reynolds, "Request for Assistance in Investigation," Aug. 2, 2022	
374	R. Germany email to S. Ellis, S. Koth, re: meeting with GBI Agents, Aug. 17, 2022.	
375	S. Ellis email to J. Herzog, A. Rowell, R. Germany re: Coffee County SEB Investigation, July 21, 2022.	
376	SOS-INV000010	
377	SOS-INV000084	
378	W. Stone email to S. Koth re: "Coffee County Elections Investigation", June 7, 2023	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
379	Stephanie Texts 06-03-forward.pdf - AZ Senate shared in their "Reading Room" [ <a href="https://web.tresorit.com/l/XMN4J#pqSHHqcq_c_eP90cdWcdSg">https://web.tresorit.com/l/XMN4J#pqSHHqcq_c_eP90cdWcdSg</a> ], in the folder "2023-07-26 Uploads".	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
380	June 9, 2020 – Presidential Preference Primary – General Primary – Nonpartisan General Election – Special Election: <a href="https://results.enr.clarityelections.com/GA/103613/256509/reports/summary.zip">https://results.enr.clarityelections.com/GA/103613/256509/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/103613/web.255599/#/summary">https://results.enr.clarityelections.com/GA/103613/web.255599/#/summary</a> )	
381	November 3, 2020 - General Election: <a href="https://results.enr.clarityelections.com/GA/105369/271927/reports/summary.zip">https://results.enr.clarityelections.com/GA/105369/271927/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/105369/web.264614/#/summary">https://results.enr.clarityelections.com/GA/105369/web.264614/#/summary</a> )	
382	January 5, 2021 – Federal Runoff: <a href="https://results.enr.clarityelections.com/GA/107556/275242/reports/summary.zip">https://results.enr.clarityelections.com/GA/107556/275242/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/107556/web.274956/#/summary">https://results.enr.clarityelections.com/GA/107556/web.274956/#/summary</a> )	
383	May 24 2022 – General Primary/Special Election: <a href="https://results.enr.clarityelections.com/GA/113667/294374/reports/summary.zip">https://results.enr.clarityelections.com/GA/113667/294374/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/113667/web.285569/#/summary">https://results.enr.clarityelections.com/GA/113667/web.285569/#/summary</a> )	

PX No.	Document Description	Defs.' Objection(s)
384	November 8, 2022 – General/Special Election: <a href="https://results.enr.clarityelections.com//GA//115465/314082/reports/summary.zip">https://results.enr.clarityelections.com//GA//115465/314082/reports/summary.zip</a> (obtained from <a href="https://results.enr.clarityelections.com/GA/115465/web.307039/#/summary">https://results.enr.clarityelections.com/GA/115465/web.307039/#/summary</a> )	
385	Fayette ballot from Discovery 00010_00000_052768	
386	Dominion Voting, Democracy Suite Windows Build Document	
387	EAC Certification	
388	Emergency ballot exhibit with hand-marking	
389	Charles Stewart III & Stephen Ansolabehere, Waiting to Vote, 14 Election L. J. 47 (2015)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
390	William A. Edelstein & Arthur D. Edelstein, Queuing and Elections: Long Lines, DREs and Paper Ballots, as presented at the 2010 Electronic Voting Technology Workshop/Workshop on Trustworthy Elections, in Washington, D.C., Aug. 9-10, 2010.	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
391	Gilbert Demonstrative: Spreadsheet Example	

PX No.	Document Description	Defs.' Objection(s)
392	Dominion043404	Defendants object to this exhibit as hearsay, F.R.E. 802.
393	Dominion043477	Defendants object to this exhibit as hearsay, F.R.E. 802.
394	Pro V&V 5.5A GA	
395	Stark Demonstrative: Georgia Attorney General Contest, 2018	
396	Fulton games	
397	Cherokee Xbox games	
398	Application log gap	
399	Uncounted ICC ballots (Excerpt of Dkt. No. 809-5, Marks Declaration)	
400	Fulton County ballot examples	
401	Ballot 28 different results	
402	Adjudicated image 11.59.32	
403	Blank Ballot Dufort	
404	Russian Targeting of Election Infrastructure	Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
405	Mar. 1, 2017 Email Chain discussing KSU Breach	
406	March 3, 2017 KSU memo re Election-related files	
407	Aug. 1, 2018 Chris Harvey Bulletin to election officials re CGG communication	

PX No.	Document Description	Defs.' Objection(s)
408	Fortalice Interview Questions	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
409	Fortalice Interview Notes	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
410	Exhibits to Aug. 11, 2017 Declaration of Chris Harvey	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
411	Declaration of Michael Shamos, Ph.D., J.D.	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
412	Exhibit A to Declaration of Michael Shamos, Ph.D., J.D.	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
413	Affidavit of Nathan D. Woods	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
414	Appendices A & B to Affidavit of Nathan D. Woods	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
415	Exhibits 1 & 2 to Declaration of David D. Cross	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
416	Affidavit of Nathan D. Woods	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
417	Appendices A & B to Affidavit of Nathan D. Woods	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
418	Exhibit 1 to Aug. 28, 2020 Declaration of Chris Harvey	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
419	STATE-DEFENDANTS-00048065 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
420	STATE-DEFENDANTS-00048066 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
421	STATE-DEFENDANTS-00048068 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
422	STATE-DEFENDANTS-00048069 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
423	STATE-DEFENDANTS-00048070 (Exhibits to Sept. 1, 2020 Declaration of David D. Cross)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
424	2021.06.28 - Expert Report of Andrew W. Appel	
425	2021.07.01 - [AEO] Expert Report of Prof. J. Alex Halderman	
426	Exhibits to 2021.07.01 - [AEO] Expert Report of Prof. J. Alex Halderman	
427	Declaration of Duncan Buell (Aug. 7, 2018)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
428	Exhibits to Declaration of Duncan Buell (Aug. 7, 2018)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
429	Declaration of Duncan Buell (June 29, 2017)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
430	Declaration of Harri Hursti (Sept. 1, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
431	Declaration of Harri Hursti (Dec 16, 2019)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
432	Declaration of Harri Hursti (Aug. 21, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
433	Exhibit A to Declaration of Harri Hursti (Aug. 21, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
434	Declaration of Harri Hursti (Aug. 24, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
435	Exhibits to Declaration of Harri Hursti (Aug. 24, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
436	Declaration of Harri Hursti (Sept. 28, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
437	Declaration of Harri Hursti (Oct. 4, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
438	Declaration of Harri Hursti (Oct. 26, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.



PX No.	Document Description	Defs.' Objection(s)
439	Exhibits to Declaration of Harri Hursti (Oct. 26, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
440	Declaration of Logan Lamb (June 30, 2017)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
441	Declaration of Logan Lamb (Aug. 3, 2018)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
442	Exhibits to Declaration of Logan Lamb (Aug. 3, 2018)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
443	Declaration of Logan Lamb (Jan. 14, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
444	Declaration of Kevin Skoglund (Oct. 22, 2019)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
445	Attachments to Declaration of Kevin Skoglund (Oct. 22, 2019)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
446	Declaration of Kevin Skoglund (Sept. 29, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
447	Declaration of Kevin Skoglund (Oct. 4, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
448	Declaration of Philip B. Stark (Sept. 9, 2018)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
449	Attachments to Declaration of Philip B. Stark (Sept. 9, 2018)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
450	Declaration of Philip B. Stark (Sept. 30, 2018)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
451	Declaration of Philip B. Stark (Oct. 22, 2019)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
452	Attachments to Declaration of Philip B. Stark (Oct. 22, 2019)	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
453	Declaration of Philip B. Stark (Dec. 16, 2019)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)

PX No.	Document Description	Defs.' Objection(s)
454	Declaration of Philip B. Stark (Aug. 23, 2020)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
455	Declaration of Philip B. Stark (Aug. 31, 2020)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
456	Declaration of Philip B. Stark (Sept. 13, 2020)	Hearsay (FRE 802/803), Relevance (FRE 401)
457	2021.07.16 - Expert Declaration of Juan Gilbert	
458	Declaration of Dr. Benjamin Adida (Aug. 28, 2020)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
459	Declaration of Dr. Benjamin Adida (Sept. 17, 2020)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
460	Attachments to Declaration of Dr. Benjamin Adida (Sept. 17, 2020)	Hearsay (FRE 802/803), Relevance (FRE 401)
461	2021.07.30 - Expert Rebuttal Report of Andrew W. Appel	

PX No.	Document Description	Defs.' Objection(s)
462	2021.08.02 - Expert Rebuttal Declaration of J. Alex Halderman	
463	Declaration of Philip B. Stark (Aug. 2, 2021)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
464	Appendix to Declaration of Philip B. Stark (Aug. 2, 2021)	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
465	Declaration of Philip B. Stark (Jan. 10, 2022)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
466	Appendices to Declaration of Philip B. Stark (Jan. 10, 2022)	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
467	2022.11.10 Persinger Declaration	Hearsay (FRE 802/803), Relevance (FRE 401)
468	Exhibits to 2022.11.10 Persinger Declaration	Hearsay (FRE 802/803), Relevance (FRE 401)
469	2022.11.22 Halderman Declaration re Coffee County	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
470	2022.11.22 Halderman Exhibit_A_-_SSA1722_Hard_Drive_Contents	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)

PX No.	Document Description	Defs.' Objection(s)
471	2022.12.05 CGG Skoglund Declaration Confidential	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
472	2022.12.13 Second Persinger Declaration	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
473	Exhibits to 2022.12.13 Second Persinger Declaration	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
474	2023.01.07 Halderman Suppl. Declaration re Coffee County	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
475	2023.01.07 Halderman Exhibit_A_Regarding Password Reset and Changed Files	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Prejudice Outweighs Probative Value (FRE 401)
476	2023.01.07 CGG Skoglund Declaration	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
477	Exhibits to 2023.01.07 CGG Skoglund Declaration	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)

PX No.	Document Description	Defs.' Objection(s)
478	STATE-DEFENDANTS-00192602	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
479	STATE-DEFENDANTS-00101411	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
480	STATE-DEFENDANTS-00128596	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
481	STATE-DEFENDANTS-00178628	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
482	STATE-DEFENDANTS-00101673	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
483	STATE-DEFENDANTS-00108403	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
484	STATE-DEFENDANTS-00122664	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
485	STATE-DEFENDANTS-00101265	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
486	STATE-DEFENDANTS-00202234 (RED EMBARGOED CISA)	Lack of Foundation (FRE 901), Relevance (FRE 401), Incomplete (FRE 106)
487	Dominion ImageCast X (ICX) Prime 21" BMD & associated peripherals	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
488	Intentionally Left Blank	

PX No.	Document Description	Defs.' Objection(s)
489	FBI Server Image	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401),
490	Audio Recording of Scott Hall Phonecall	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
491	Feb. 10, 2022 AJC Audio Recording of Mark Niesse & Brad Raffensperger Discussing Alex Halderman's Report and Its Infeasibility in Real-World Conditions	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
492	Audio Recording of Gabe Sterling Describing Alex Halderman's Report as Untrustworthy	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
493	Coffee County Surveillance Videos	Lack of Foundation (FRE 901), Relevance (FRE 401), Incomplete (FRE 106)
494	The Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022), YouTube (May 9, 2022), <a href="https://www.youtube.com/watch?app=desktop&amp;v=PbB_c_PX8D8+at+approximately+35%3A30&amp;feature=youtu.be">https://www.youtube.com/watch?app=desktop&amp;v=PbB_c_PX8D8+at+approximately+35%3A30&amp;feature=youtu.be</a>	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
495	Misty Hampton - DouglasNow video Pt. 1	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
496	Misty Hampton - DouglasNow video Pt. 2	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)



PX No.	Document Description	Defs.' Objection(s)
497	Video of Cathy Latham - GA Senate Hearing	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
498	Intentionally Left Blank	
499	jeff-lenberg-reveals-details-of-forensic-investigation-in-coffee-county-ga-after-wapo-hit-piece.mp4	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
500	AP Image ID No. 21005555186625	Lack of Foundation (FRE 901), Relevance (FRE 401), Incomplete (FRE 106)
501	Image of Georgia Voting Machine, January 5, 2021	Lack of Foundation (FRE 901), Relevance (FRE 401), Incomplete (FRE 106)
502	June 7, 2021 BMD Photo	Lack of Foundation (FRE 901), Relevance (FRE 401)
503	Gabe Sterling, How to safeguard democracy, Universite de Geneve (Nov. 25, 2021)	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
504	Pages 291-315 from Curling - CCBOE Docs Responsive to Subpoenas (1)-Jill Resignation	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
505	Pages 221-245 from Curling - CCBOE Docs Responsive to Subpoenas (1)-Misty Resignation	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
506	Pages 5-45 of CCBOE Responses No. 2 - DyAnna Hayes Resignation	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
507	11/10/2020 email thread between Robert Sinners and Misty Hampton, Sinners Requests Official Meeting	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)



PX No.	Document Description	Defs.' Objection(s)
	Minutes and Audio of the 11/10/2020 BOE Meeting	
508	Coffee-Cnty-ORR00000231	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
509	Dominion022179	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
510	Dominion023452	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
511	Dominion069797-072989 (October 2020)_Part225	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
512	Dominion075160-075991 (December 2020)_Part095	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
513	Dominion075160-075991	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
514	Dominion075992-076795 (January 2020)-emails only_Part098	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
515	Dominion079353-081275	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
516	Dominion081276-081975 (June 2021)_Part026	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
517	STATE-DEFENDANTS- 00001942	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
518	STATE-DEFENDANTS- 00099430	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)

PX No.	Document Description	Defs.' Objection(s)
519	STATE-DEFENDANTS-00100970	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
520	STATE-DEFENDANTS-00194205	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
521	STATE-DEFENDANTS-00101321	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
522	STATE-DEFENDANTS-00095935	Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
523	"Lawsuit: New Georgia voting system denies secret ballot," Feb. 25, 2020, <a href="https://www.youtube.com/watch?v=7JWiursXHEo">https://www.youtube.com/watch?v=7JWiursXHEo</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
524	"The Office of Secretary of State State of Georgia, In the Matter of: State Election Board Meeting, Wednesday, June 21, 2023, Georgia State Capitol, Room b341, Atlanta, Georgia, 9:00am, Volume 2 of 2," June 21, 2023, <a href="https://sos.ga.gov/sites/default/files/forms/2023%20Transcripts_0.pdf">https://sos.ga.gov/sites/default/files/forms/2023%20Transcripts_0.pdf</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
525	"In The Matter Of: Athens-Clarke County Board Elections and Registration, March 11, 2020," Mar. 11, 2020, <a href="https://sos.ga.gov/sites/default/files/2022-02/2020_seb.pdf">https://sos.ga.gov/sites/default/files/2022-02/2020_seb.pdf</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
526	"In The Matter Of: Secretary of State Board Meeting, February 28, 2020," Feb. 28, 2020, <a href="https://sos.ga.gov/sites/default/files/2022-02/2020_seb.pdf">https://sos.ga.gov/sites/default/files/2022-02/2020_seb.pdf</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)

PX No.	Document Description	Defs.' Objection(s)
527	"In the Matter Of: State Election Board Meeting, August 1, 2023," Aug. 1, 2023, <a href="https://sos.ga.gov/sites/default/files/forms/SEB%208-01-23_BUNDLE.pdf">https://sos.ga.gov/sites/default/files/forms/SEB%208-01-23_BUNDLE.pdf</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
528	"In the Matter Of: State Election Board Meeting, September 28, 2022," Sept. 22, 2023, <a href="https://sos.ga.gov/sites/default/files/forms/2022%20Transcripts.pdf">https://sos.ga.gov/sites/default/files/forms/2022%20Transcripts.pdf</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
529	"11/1/2023 - Senate Committee on Ethics," Nov. 1, 2023, <a href="https://vimeo.com/showcase/9076408?video=868832917">https://vimeo.com/showcase/9076408?video=868832917</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
530	"Secretary Raffensperger Continues Focus on Election Security for 2024," Sept. 6, 2023, <a href="https://madmimi.com/p/f406371?pack=162731-175641393-14307111335-60a0fd97a05360e4386c82a31acf06a19d9cd9b4">https://madmimi.com/p/f406371?pack=162731-175641393-14307111335-60a0fd97a05360e4386c82a31acf06a19d9cd9b4</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
531	Notice of Change in post-election audit law	
532	Robert Sinners communications re: Coffee investigation	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
533	Exhibit 1, Brown Declaration, Jan. 10, 2023	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
534	Exhibit 2, Brown Declaration, Dec. 4, 2022	
535	Exhibit 1, Davis Declaration, Dec. 6, 2022	

PX No.	Document Description	Defs.' Objection(s)
536	Exhibit A, DuFort Declaration, Jan. 1, 2022	Lack of Foundation (FRE 901), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
537	Exhibit B, DuFort Declaration, Nov. 1, 2022	Lack of Foundation (FRE 901), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
538	Exhibit C, DuFort Declaration, May 24, 2022	Lack of Foundation (FRE 901), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
539	Exhibit D, DuFort Declaration, May 24, 2022	Lack of Foundation (FRE 901), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
540	Exhibit E, DuFort Declaration, Nov. 3, 2020	Lack of Foundation (FRE 901), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
541	Exhibit F, DuFort Declaration, Nov. 3, 2020	Lack of Foundation (FRE 901), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
542	Exhibit G, DuFort Declaration, Dec. 5, 2022	Hearsay (FRE 802/803), Relevance (FRE 401)
543	Exhibit 17, Hursti Declaration, Sept. 1, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001-1008)
544	Exhibit 19-A, Marks Declaration, Sept. 1, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001-1008)
545	Exhibit 19-B, Marks Declaration, Aug. 28, 2020	Hearsay (FRE 802/803)
546	Exhibit 19-C, Marks Declaration, Sept. 1, 2020	Hearsay (FRE 802/803)
547	Exhibit 19-D, Marks Declaration, Sept. 1, 2020	Hearsay (FRE 802/803)

PX No.	Document Description	Defs.' Objection(s)
548	Exhibit 1, Marks Declaration, Feb. 12, 2021	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
549	Exhibit 2, Marks Declaration, Feb. 12, 2021	
550	Exhibit 3, Marks Declaration, Feb. 12, 2023	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
551	Exhibit E, DuFort Declaration, Nov. 3, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001-1008)
552	Exhibit F, DuFort Declaration, Nov. 3, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001-1008)
553	Exhibit G, DuFort Declaration, Dec. 5, 2022	Lack of Foundation (FRE 901), Hearsay (FRE 802/803)
554	Exhibit 1, Martin Declaration, Jan. 1, 2020	
555	Exhibit 2, Martin Declaration, Aug. 11, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
556	Exhibit 1, Marks Declaration, Aug. 24, 2020	Hearsay (FRE 802/803), Relevance (FRE 401)
557	Exhibit 2, Marks Declaration, May 21, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008), Impermissible Expert Testimony (FRE 703/701), Best Evidence Rule (FRE 10001-1008)
558	Exhibit 3, Marks Declaration, Aug. 11, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001-1008)

PX No.	Document Description	Defs.' Objection(s)
559	Exhibit 4, Marks Declaration, Aug. 19, 2020	Hearsay (FRE 802/803), Relevance (FRE 403)
560	Exhibit A, DuFort Declaration, Aug. 23, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
561	Exhibit B, DuFort Declaration, June 13, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
562	Exhibit C, DuFort Declaration, Aug. 23, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
563	Exhibit D, DuFort Declaration, Aug. 10, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Best Evidence Rule (FRE 1001-1008)
564	Exhibit 1, Shirley Declaration, Aug. 11, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
565	Exhibit 2, Shirley Declaration, Aug. 11, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
566	Exhibit 3, Shirley Declaration, Aug. 11, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001-1008)
567 (old 46)	2019-08-09 State Defs Suppl Notice re New Election System Vendor Contract	
568 (old 46)	2019-08-09 Ex. A - August 9, 2019 Notice of Award	

PX No.	Document Description	Defs.' Objection(s)
569 (old 46)	2019-08-09 Ex. B - August 9, 2019 Certification of the Dominion Voting System for Georgia	
570 (old 131)	State Defs' Supplement to Response to this Court's July 23, 2019 Order	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
571 (old 131)	SOS Notice of Intent to Award	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
572 (old 488)	Halderman demonstration video involving Fulton County election equipment	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
573 (old 488)	Stillshots of Halderman demonstration video involving Fulton County election equipment	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)

PX No.	Document Description	Defs.' Objection(s)
574 (old 498)	Short video embedded in 11Alive Staff, Questions raised in timeline of state response to Coffee County breach, 11Alive News (Sep. 26, 2022, 1:44 PM)	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
575 (old 498)	Long video embedded in 11Alive Staff, Questions raised in timeline of state response to Coffee County breach, 11Alive News (Sep. 26, 2022, 1:44 PM)	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**ATTACHMENT D-2:**  
**CGG PLAINTIFFS' EXHIBIT LIST**  
**Revised December 11, 2023**

CGG Plaintiffs identify herein the individual pieces of documentary and physical evidence that will be tendered at trial. State Defendants' objections to CGG Plaintiffs' exhibits are listed separately following CGG Plaintiffs' exhibit list. CGG Plaintiffs reserve the right to modify or supplement this list of exhibits based on further discovery of information and the pretrial proceedings in this lawsuit. CGG Plaintiffs further reserve the right to supplement this list with reasonable notice to counsel.

Defendants reserve the right to object to CGG Plaintiffs' additional exhibits added on December 11, 2023 after review.

PX No.	Document Description	Citation
CGG 02	CGG Complaint to SEB regarding SOS failure to comply with post-election audit statutes	See exhibit folder CGG 02
CGG 04	CGG rule-making request for LAT compliance	See exhibit folder CGG 04
CGG 05	CGG rule-making request for CISA security evaluation	See exhibit folder CGG 05
CGG 06	CGG rule-making request for security incident reporting	See exhibit folder CGG 06
CGG 10	CGG Complaint to SEB regarding Misty Hampton access to Treutlen County Voting system	See exhibit folder CGG 10
CGG 11	Informal transcript Senate Ethics Comm Hearing re: Election Security	See exhibit folder CGG 11
CGG 12	Court Hearing Transcript re: Sidney Powell's request to image voting system Pearson v Kemp	See exhibit folder CGG 12
CGG 19	Documentation by CGG observers of security conditions and requirements (obtained via Open Records Requests) for municipalities borrowing county voting system equipment-- 11/7/23 election	
CGG 26	Emails among Chairman Duffey, staff and GBI re: Sept. 28, 2022 SEB meeting re: Halderman Report, Coffee County	See exhibit folder CGG 26

PX No.	Document Description	Citation
CGG 27	WJBF report on SOS check of voting system m including embedded video <a href="https://www.wjbf.com/csra-news/georgia-secretary-of-state-visits-glascock-county-to-check-voting-equipment/?utm_source=ground.news&amp;utm_medium=referral">https://www.wjbf.com/csra-news/georgia-secretary-of-state-visits-glascock-county-to-check-voting-equipment/?utm_source=ground.news&amp;utm_medium=referral</a>	WJBF report on SOS check of voting system m including embedded video <a href="https://www.wjbf.com/csra-news/georgia-secretary-of-state-visits-glascock-county-to-check-voting-equipment/?utm_source=ground.news&amp;utm_medium=referral">https://www.wjbf.com/csra-news/georgia-secretary-of-state-visits-glascock-county-to-check-voting-equipment/?utm_source=ground.news&amp;utm_medium=referral</a>
CGG 28	WALB report on "Health Checks" with embedded video Raffensperge interview re: election security.  <a href="https://www.walb.com/2023/09/13/ga-secretary-state-brad-raffensperger-discusses-health-checks-voting-machines-statewide/">https://www.walb.com/2023/09/13/ga-secretary-state-brad-raffensperger-discusses-health-checks-voting-machines-statewide/</a>	WALB report on "Health Checks" with embedded video Raffensperge interview re: election security.  <a href="https://www.walb.com/2023/09/13/ga-secretary-state-brad-raffensperger-discusses-health-checks-voting-machines-statewide/">https://www.walb.com/2023/09/13/ga-secretary-state-brad-raffensperger-discusses-health-checks-voting-machines-statewide/</a>
CGG 29	Washington Examiner Article re: "health checks" and 2024 election security with SOS quotes. <a href="https://www.washingtonexaminer.com/politics/georgia-voting-machines-security-under-scrutiny-2024">https://www.washingtonexaminer.com/politics/georgia-voting-machines-security-under-scrutiny-2024</a>	Washington Examiner Article re: "health checks" and 2024 election security with SOS quotes. <a href="https://www.washingtonexaminer.com/politics/georgia-voting-machines-security-under-scrutiny-2024">https://www.washingtonexaminer.com/politics/georgia-voting-machines-security-under-scrutiny-2024</a>
CGG 31	Northampton PA BMDs misrecording votes <a href="https://bradblog.com/?p=14839">https://bradblog.com/?p=14839</a>	Northampton PA BMDs misrecording votes <a href="https://bradblog.com/?p=14839">https://bradblog.com/?p=14839</a>

PX No.	Document Description	Citation
CGG 32	SEB Meeting transcript	See exhibit folder CGG 32
CGG 33	SEB Letter rejecting CGG rule-making petition	See exhibit folder CGG 33
CGG 34	CGG letter to SEB re: AG's opinion on conditions for use of voting systems	See exhibit folder CGG 34
CGG 35	SEB Letter rejection CGG rule-making petitions	See exhibit folder CGG 35
CGG 36	Nov. 29, 2023 CGG Rule-making petition to SEB--LAT	See exhibit folder CGG 36, 36-A
CGG 37	Nov. 29, 2023 CGG Rule-making petition to SEB—Ballot secrecy	See exhibit folder CGG 37
CGG 38	July 14-22, 2022 emails Rachel Roberts to SOS re: recertification of Coffee equipment (source GBI image)	See exhibit folder CGG 38
CGG 39	July 15, 2022 email Germany to Herzog, re: recertification of Coffee equipment	See exhibit folder CGG 39
CGG 40	Skoglund paper--Problems in Northampton, PA in Nov. 2023	See exhibit folder CGG 40
CGG 41	Coffee County James Barnes email request to Cox re: Draft Report to Josh Blanchard 8/24/21 (source GBI image)	See exhibit folder CGG 41
CGG 42	Cox email re: Barnes's draft report to Josh Blanchard 8/24/21 (source: GBI image)	See exhibit folder CGG 42

PX No.	Document Description	Citation
CGG 43	Gabe Sterling 11/7/23 Tweet Re: Northampton election	See exhibit folder CGG 43
CGG 44	April 11, 2022 Text Messages Exchange Germany/ Herzog re: Coffee County and Wash Post article pending	See exhibit folder CGG 44
CGG 45	James Barnes Report to Blanchard 8/24/21 Equipment Condition	See exhibit folder CGG 45
CGG 46	April 12, 2022 Herzog/Germany emails re Washington Post inquiry re: Coffee County	See exhibit folder CGG 46
CGG 47	April 11, 2022 emails Washington Post and SOS re: Coffee	See exhibit folder CGG 47
CGG 48	12/18/20 SOS discussion of Fulton absentee voting issues	See exhibit folder CGG 48
CGG 49	4/25/22 SOS/Brumback emails re: opening of Coffee investigation	Doc. 1633-7
CGG 50	SOS Spokesman to Wash Post Re: imaging of Coffee server 5/12/22	See exhibit folder CGG 50
CGG 51	Washington Post inquiry re: no chain of custody form for Coffee server 4/28/22	See exhibit folder CGG 51
CGG 52	SOS to Coffee re: conducting interviews 7/20/22-7/21/22	See exhibit folder CGG 52
CGG 53	Barnes to SOS re Credentials for Coffee Server 5/24/21	See exhibit folder CGG 53

PX No.	Document Description	Citation
CGG 54	Washington Post /SOS emails re: Coffee County and BMDs 10/21/22	See exhibit folder CGG 54
CGG 55	SOS approves reuse of memory cards in Coffee 6/1/22	See exhibit folder CGG 55
CGG 56	Emma Brown to Vickers 3/28/22 re Coffee Server breach	See exhibit folder CGG 56
CGG 57	12/31/20 Haliburton to Hampton re: inspection in Coffee (source: GBI image)	See exhibit folder CGG 57
CGG 58	12/3/20-12/5/20 Text Messages Tony Rowell to Voyles re Ware County Machine	See exhibit folder CGG 58

PX No.	Document Description	State Defendants' Objections
CGG 02	CGG Complaint to SEB regarding SOS failure to comply with post-election audit statutes	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1006)
CGG 04	CGG rule-making request for LAT compliance	
CGG 05	CGG rule-making request for CISA security evaluation	
CGG 06	CGG rule-making request for security incident reporting	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Best Evidence Rule (FRE 1006)
CGG 10	CGG Complaint to SEB regarding Misty Hampton access to Treutlen County Voting system	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Law Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
CGG 11	Informal transcript Senate Ethics Comm Hearing re: Election Security	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Best Evidence Rule (FRE 1006)
CGG 12	Court Hearing Transcript re: Sidney Powell's request to image voting system Pearson v Kemp	
CGG 19	Documentation by CGG observers of security conditions and requirements (obtained via Open Records Requests) for municipalities borrowing county voting system equipment-- 11/7/23 election	
CGG 26	Emails among Chairman Duffey, staff and GBI re: Sept. 28, 2022 SEB meeting re: Halderman Report, Coffee County	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 403), Incomplete (FRE 106)

PX No.	Document Description	State Defendants' Objections
CGG 27	WJBF report on SOS check of voting system m including embedded video <a href="https://www.wjbf.com/csra-news/georgia-secretary-of-state-visits-glascock-county-to-check-voting-equipment/?utm_source=ground.news&amp;utm_medium=referral">https://www.wjbf.com/csra-news/georgia-secretary-of-state-visits-glascock-county-to-check-voting-equipment/?utm_source=ground.news&amp;utm_medium=referral</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
CGG 28	WALB report on "Health Checks" with embedded video Raffensperge interview re: election security.  <a href="https://www.walb.com/2023/09/13/ga-secretary-state-brad-raffensperger-discusses-health-checks-voting-machines-statewide/">https://www.walb.com/2023/09/13/ga-secretary-state-brad-raffensperger-discusses-health-checks-voting-machines-statewide/</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
CGG 29	Washington Examiner Article re: "health checks" and 2024 election security with SOS quotes. <a href="https://www.washingtonexaminer.com/politics/georgia-voting-machines-security-under-scrutiny-2024">https://www.washingtonexaminer.com/politics/georgia-voting-machines-security-under-scrutiny-2024</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
CGG 31	Northampton PA BMDs misrecording votes <a href="https://bradblog.com/?p=14839">https://bradblog.com/?p=14839</a>	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
CGG 32	SEB Meeting transcript	Hearsay (FRE 802/803), Relevance (FRE 401)
CGG 33	SEB Letter rejecting CGG rule-making petition	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)



PX No.	Document Description	State Defendants' Objections
CGG 34	CGG letter to SEB re: AG's opinion on conditions for use of voting systems	Hearsay (FRE 802/803), Best Evidence Rule (FRE 1006), Improper Opinion Testimony By Lay Witness (FRE 701)
CGG 35	SEB Letter rejection CGG rule-making petitions	

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**ATTACHMENT D-3:**  
**DEFENDANTS' EXHIBIT LIST**

Defendants identify herein their trial exhibits for this lawsuit. Plaintiffs' objections to Defendants' trial exhibits are listed separately following Defendants' exhibit list. Defendants reserve the right to modify or supplement this list of proposed trial exhibits based on further discovery of information and the pretrial proceedings in this lawsuit. Defendants further reserve the right to supplement this list with reasonable notice to counsel.

The document type and document description of the proposed trial exhibits below are to help Plaintiffs identify the exhibits. If any document type or document description is incorrect, Defendants reserve the right to clarify. If there is any confusion about the identity of a document, please contact counsel for Defendants.

Exhibit No.	Document Description	Document Type
1	2018.08.14 <b>Declaration of Merritt Beaver</b> (Exhibit 1 to Defs' Kemp and State Election Board Response to Motions for Preliminary Injunction)	Declaration
2	2018.08.14 <b>Declaration of Chris Harvey</b> (Exhibit 2 to Defs' Kemp and State Election Board Response to Motions for Preliminary Injunction)	Declaration
3	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - <b>Declaration of Michael Shamos, Ph.D., J.D.</b>	Declaration
4	Exhibit A to Declaration of Michael Shamos, Ph.D 472-1: <b>Resume of Michael Ian Shanos</b>	Resume
5	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit B - <b>Declaration of S. Merritt Beaver</b>	Declaration

Exhibit No.	Document Description	Document Type
6	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit C - <b>Declaration of Theresa Payton</b>	Declaration
7	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit D - <b>Declaration of Michael Barnes</b>	Declaration
8	Exhibit A to <b>Declaration of Michael Barnes</b> - Certified copy of the Direct Record Electronic Voting Machine Recap for Fulton County precincts 06G, 02J, and 02K at the Grady High School Polling Location from the 2018 General Election Held on November 6, 2018.	Certified Record
9	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit E - Rockdale Co. Response to Subpoena	Pleading - Response

Exhibit No.	Document Description	Document Type
10	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit F - <b>Declaration of Chatham Co Elections Supervisor, Russell Bridges</b>	Declaration
11	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit G - Michael Barnes Deposition Excerpts	Deposition Excerpts - Michael Barnes Deposition
12	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit H - Jennifer Doran Deposition Excerpts	Deposition Excerpts - Jennifer Doran Deposition
13	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit I - <b>T. Lynn Ledford Deposition Excerpts</b>	Deposition Excerpts - Lynn Ledford Deposition
14	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit J - <b>Michael Barnes Deposition Transcript</b>	Deposition Transcript

Exhibit No.	Document Description	Document Type
15	2020.08.24 Exhibit 1 to Defs' Emergency Mot for Expedited Discovery for Preliminary Injunction Hearing - State Defs' Second RPDs to Curling Plaintiffs dated 08.21.2020	Discovery
16	2020.08.24 Exhibit 2 to Defs' Emergency Mot for Expedited Discovery for Preliminary Injunction Hearing - Email thread from Cross to Belifnante et al re Curling - RPDs to Curling Plaintiffs and expedited discovery concerns dated 08.21.2020	Email
17	2020.08.25 Exhibit 1 to Response re Motion for Preliminary Injunction on paper Pollbook Backups - <b>Affidavit Declaration of Chris Harvey</b>	Declaration
18	2020.08.26 Exhibit 1 (A) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Exhibit A - Dec. of Dr. Eric D. Coomer</b>	Declaration

Exhibit No.	Document Description	Document Type
19	2020.08.26 Exhibit 2 (B) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit B - <b>Dec. of Juan E. Gilbert, Ph.D</b>	Declaration
20	2020.08.26 Exhibit 3 (C) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit C - Part 1 - <b>Deposition of J. Alex Halderman, Ph.D</b>	Deposition
21	2020.08.26 Exhibit 4 (C-2) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit 2 - Part 2 of 3 - <b>Deposition of J. Alex Halderman, Ph.D and (Exs. 1-9)</b>	Compilation of Halderman Deposition Exhibits 1 - 9
22	Halderman Deposition Exhibit 1 - Expert Report of J.Alex Halderman	Deposition Exhibit

Exhibit No.	Document Description	Document Type
23	Halderman Deposition Exhibit 2 - <b>Expert Report of J.Alex Halderman</b>	Deposition Exhibit
24	Halderman Deposition Exhibit 2 (A) of Expert Report of J.Alex Halderman - <b>Halderman CV</b>	Deposition Exhibit
25	Halderman Deposition Exhibit 3 - <b>Supplement to the Expert Report of H. Alex Halderman</b>	Deposition Exhibit
26	Halderman Deposition Exhibit 4 - Website page - Election Verification Network Agenda for 2019 Conference dated 02.18.2020	Deposition Exhibit
27	Halderman Deposition Exhibit 5 - Website page - Election Verification Network About Us page	Deposition Exhibit
28	Halderman Deposition Exhibit 6 - U.S. House Appropriations Subcommittee on Financial Service and General Government "Election Security: Ensuring the Integrity of U.S. Election Systems" February 17, 2019	Deposition Exhibit



Exhibit No.	Document Description	Document Type
29	Halderman Deposition Exhibit 7- U.S. Senate Select Committee on Intelligence Russian Interference in the 2016 U.S. Elections - Expert Testimony by J. Alex Halderman Professor of Computer Science, University of Michigan dated 06.21.2017	Deposition Exhibit
30	Halderman Deposition Exhibit 8 - Redacted Report of the Select Committee on Intelligence United States Senate on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election Volume 1: Russian Efforts Against Election Infrastructure with Additional Views.	Deposition Exhibit
31	Halderman Deposition Exhibit 9 - New York Times article, "I Hacked an Election by J. Alex Halderman. So Can the Russians" dated April 5, 2018	Deposition Exhibit
32	2020.08.26 Exhibit 5 (C-3) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit 3 - Part 3 of 3 -	Compilation of Halderman Deposition Exhibits 10 through 15

Exhibit No.	Document Description	Document Type
	<b>Deposition of J. Alex Halderman, Ph.D and (Exs. 10-15)</b>	
33	Halderman Deposition Exhibit No. 10 - 2017.06.21 Article co-authored by Jay Halderman entitled "Here's how to keep Russian hackers from attacking the 2018 elections"	Deposition Exhibit
34	Halderman Deposition Exhibit No. 11 - Medium.com online article entitled Want to Know if the Election was Hacked? Look at the Ballots authored by J. Alex Halderman	Deposition Exhibit
35	Halderman Deposition Exhibit No. 12 alumnus.alumni.umrich.edu (University of Michigan) online article entitled Hacking the Vote: It's Easier Than You Thing by Steve Friess - Professor J. Alex Halderman has made a career studying electronic voting security...	Deposition Exhibit

Exhibit No.	Document Description	Document Type
36	Halderman Deposition Exhibit No. 13 - U.S. Patent No. 8,033,463B@ dated 10.11.2011 by Felten for System and Method for Machine-Assited Election Auditing	Deposition Exhibit
37	Verified Voting Foundation article entitled Principles for New Voting Systems dated 02.01.2015	Deposition Exhibit
38	Halderman Deposition Exhibit No. 15 - Undated University of Michigan article entitled "Can Voters Detect Malicious Manipulation of Ballot Marking Devices?" co-authored by J. Alex Halderman	Deposition Exhibit
39	Exhibit 6 (D) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Declaration of Jack Cobb</b>	Declaration

Exhibit No.	Document Description	Document Type
40	Exhibit 7 (E) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Declaration of Jaun E. Gilbert, PH.D.</b>	Declaration
41	Exhibit 8 (F) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Declaration of Mark Riccobono</b>	Declaration
42	Exhibit 9 (G) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Supplemental Declaration of Chris Harvey</b>	Declaration

Exhibit No.	Document Description	Document Type
43	Exhibit 1 (A) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - Supplemental <b>Declaration of Dr. Eric Coomer</b>	Declaration
44	Exhibit 2 (B) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - <b>Declaration of Dr. Benjamin Adida</b>	Declaration

Exhibit No.	Document Description	Document Type
45	Exhibit 3 (C) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - <b>Supplemental Declaration of Chris Harvey</b>	Declaration
46	Exhibit 1 (A) to SURREPLY BRIEF re 785 MOTION for Preliminary Injunction State Defendants' Surreply in Opposition to Curling Plaintiffs' Fourth Preliminary Injunction Motion - <b>Supplemental Declaration of Jack Cobb</b>	Declaration
47	Exhibit 2 (B) to SURREPLY BRIEF re 785 MOTION for Preliminary Injunction State Defendants' Surreply in Opposition to Curling Plaintiffs' Fourth Preliminary Injunction Motion - <b>Supplemental Declaration of Chris Harvey</b>	Declaration

Exhibit No.	Document Description	Document Type
48	State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction	Pleading
49	Exhibit 1 to State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction - Declaration of Derrick Gilstrap	Declaration
50	Exhibit 2 to State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction - Online article from Savannah now entitled "Recount results in: Derek Mallow wins Georgia House race by 19 votes authored by DeAnn Komaneky	Article
51	2019.07.25 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 1 of 2	Hearing Transcript
52	2019.07.26 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 2 of 2	Hearing Transcript
53	2020.09.10 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 1	Hearing Transcript

Exhibit No.	Document Description	Document Type
54	2020.09.11 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 2	Hearing Transcript
55	2020.09.14 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 3	Hearing Transcript
56	Appel, Andrew 2022.01.07 Deposition Exhibit 1 - Notice of Deposition of Andrew W. Appel	Deposition Exhibit
57	Appel, Andrew 2022.01.07 Deposition Exhibit 2 - Declaration of Andrew W.Appel in Support of Motion for Preliminary Injunction	Deposition Exhibit
58	Appel, Andrew 2022.01.07 Deposition Exhibit 3 - Expert Review of Andrew W. Appel,	Deposition Exhibit
59	Appel, Andrew 2022.01.07 Deposition Exhibit 4 - Declaration of Andrew W. Appel iso Mot for PI	Deposition Exhibit
60	Appel, Andrew 2022.01.07 Deposition Exhibit 5 - Declaration of Andrew W. Appel iso Mot for PI	Deposition Exhibit
61	Appel, Andrew 2022.01.07 Deposition Exhibit 6 - Declaration of Juan E. Gilbert, Ph.D	Deposition Exhibit
62	Appel, Andrew 2022.01.07 Deposition Exhibit 7 - State Defs' Expert Disclosures - Reports	Deposition Exhibit



Exhibit No.	Document Description	Document Type
63	Appel, Andrew 2022.01.07 Deposition Exhibit 8 - Rebuttal Report of Andrew W. Appel, 07/30/21	Deposition Exhibit
64	Appel, Andrew 2022.01.07 Deposition Exhibit 9 - Freedom to Tinker article entitled, Georgia's Election Certification Avoided an Even Worse Nightmare That's Just Waiting to Happen Next Time	Deposition Exhibit
65	Appel, Andrew 2022.01.07 Deposition Exhibit 10 - Freedom to Tinker article entitled, Did Sean Hannity misquote me?	Deposition Exhibit
66	Appel, Andrew 2022.01.07 Deposition Exhibit 11 - Freedom to Tinker article entitled, Voting Machines I Recommend	Deposition Exhibit
67	Appel, Andrew 2022.01.07 Deposition Exhibit 12 - Document entitled Scientistssay no credible evidence ofcomputer fraud in the 2020 election outcome, but policy makers must work with experts to improve confidence	Deposition Exhibit
68	Barnes, Michael 2019.06.27 Deposition Exhibit 20 - Defendants Secretary of State, State Election Board, and State Election Board Members' Response to Order Dated April 16, 2019	Deposition Exhibit

Exhibit No.	Document Description	Document Type
69	Barnes, Michael 2019.06.27 Deposition Exhibit 21 - E-mail with attachment to Milsteen from Marks, 10/11/17, Bates labeled CGG 1 - 190	Deposition Exhibit
70	Barnes, Michael 2019.06.27 Deposition Exhibit 22 - Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 12.4 Challenge Board	Deposition Exhibit
71	Barnes, Michael 2019.06.27 Deposition Exhibit 23 - Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 2.3 Deleting a Database	Deposition Exhibit
72	Barnes, Michael 2019.06.27 Deposition Exhibit 24 - Ballot image printout from GEMS computer	Deposition Exhibit
73	Barnes, Michael 2019.06.27 Deposition Exhibit 25 - Ballot image report from a GEMS computer	Deposition Exhibit
74	Barnes, Michael 2019.06.27 Deposition Exhibit 26 - Handwritten page	Deposition Exhibit
75	Barnes, Michael 2019.06.27 Deposition Exhibit 27 - Direct Record Electronic Voting Machine Recap records	Deposition Exhibit
76	Barnes, Michael 2019.06.27 Deposition Exhibit 28 - Copy of photograph	Deposition Exhibit
77	Barnes, Michael 2019.06.27 Deposition Exhibit 29 - USA vs. Netyksho, et al. Indictment	Deposition Exhibit

Exhibit No.	Document Description	Document Type
78	Barnes, Michael 2019.06.27 Deposition Exhibit 30 - Russian Targeting of Election Infrastructure During the 2016 Election: Summary of Initial Findings and Recommendations, May 8, 2018	Deposition Exhibit
79	Barnes, Michael 2019.06.27 Deposition Exhibit 31 - "Who, What, Why" article titled "Kemp's Aggressive Gambit to Distract from Election Security Crisis."	Deposition Exhibit
80	Barnes, Michael 2019.06.27 Deposition Exhibit 32 - Press release from the Secretary of State's office entitled, After Failed Hacking Attempt SOS Launches Investigation into Georgia Democratic Party	Deposition Exhibit
81	Barnes, Michael 2022.02.11 Deposition Exhibit 1 - Curling Plaintiffs Third Amd NOD of Office of the Secretary of the State, no Bates Numbers	Deposition Exhibit
82	Barnes, Michael 2022.02.11 Deposition Exhibit 2 - Michael Barnes LinkedIn Profile - No Bates Numbers	Deposition Exhibit
83	Barnes, Michael 2022.02.11 Deposition Exhibit 3 - Michael Barnes LinkedIn Profile - No Bates Numbers	Deposition Exhibit
84	Barnes, Michael 2022.02.11 Deposition Exhibit 4 - Email chain dated January 2020	Deposition Exhibit

Exhibit No.	Document Description	Document Type
85	Barnes, Michael 2022.02.11 Deposition Exhibit 5 - Email chain dated January 2020	Deposition Exhibit
86	Barnes, Michael 2022.02.11 Deposition Exhibit 6 - Email chain dated February 2020	Deposition Exhibit
87	Barnes, Michael 2022.02.11 Deposition Exhibit 7 - Email chain dated February 2020	Deposition Exhibit
88	Barnes, Michael 2022.02.11 Deposition Exhibit 8 - Email chain dated February 2020	Deposition Exhibit
89	Barnes, Michael 2022.02.11 Deposition Exhibit 9 - Email chain dated May 2020	Deposition Exhibit
90	Barnes, Michael 2022.02.11 Deposition Exhibit 10 - Email dated 06/01/2020 from Scott Tucker to Gabriel Sterling and others	Deposition Exhibit
91	Barnes, Michael 2022.02.11 Deposition Exhibit 11 - Email dated 06/01/2020 from Scott Tucker to Gabriel Sterling and others	Deposition Exhibit
92	Barnes, Michael 2022.02.11 Deposition Exhibit 12 - Email dated 06/01/2020	Deposition Exhibit
93	Barnes, Michael 2022.02.11 Deposition Exhibit 13 Email chain dated 06/03/20 20	Deposition Exhibit
94	Barnes, Michael 2022.02.11 Deposition Exhibit 14 - Email chain dated 06/20/2020	Deposition Exhibit
95	Barnes, Michael 2022.02.11 Deposition Exhibit 15 - Email chain dated 06/20/2020	Deposition Exhibit

Exhibit No.	Document Description	Document Type
96	Barnes, Michael 2022.02.11 Deposition Exhibit 16 - Email chain dated 06/20/2020	Deposition Exhibit
97	Barnes, Michael 2022.02.11 Deposition Exhibit 17 - Email chain dated 06/20/2020	Deposition Exhibit
98	Barnes, Michael 2022.02.11 Deposition Exhibit 18 - Email chain dated 06/20/2020	Deposition Exhibit
99	Barnes, Michael 2022.02.11 Deposition Exhibit 19 - Email dated 06/11/2020 fro Cynthia Willingham to Scott Tucker and Others	Deposition Exhibit
100	Barnes, Michael 2022.02.11 Deposition Exhibit 20 - Email chain dated 06/20/2020	Deposition Exhibit
101	Barnes, Michael 2022.02.11 Deposition Exhibit 21 - Email chain dated 06/20/2020	Deposition Exhibit
102	Barnes, Michael 2022.02.11 Deposition Exhibit 22- Email chain dated July 2020	Deposition Exhibit
103	Barnes, Michael 2022.02.11 Deposition Exhibit 23 - Email chain dated August 2020	Deposition Exhibit
104	Barnes, Michael 2022.02.11 Deposition Exhibit 24 - Email chain dated August 2020	Deposition Exhibit
105	Barnes, Michael 2022.02.11 Deposition Exhibit 25 - Email chain dated September 2020	Deposition Exhibit
106	Barnes, Michael 2022.02.11 Deposition Exhibit 26 - Email chain dated September 2020	Deposition Exhibit

Exhibit No.	Document Description	Document Type
107	Barron, Richard 2022.01.31 Deposition Exhibit 1 - 1-18-22, Curling Plaintiffs' Third Amended Notice of Deposition of Fulton County Defendants re: The above-captioned action.	Deposition Exhibit
108	Barron, Richard 2022.01.31 Deposition Exhibit 9 - 466, 9-29-20, E-mail string from Scott Tucker to Blake Evans re: Two ballots printing	Deposition Exhibit
109	Barron, Richard 2022.01.31 Deposition Exhibit 10 - 06.09.2020 - E-mail string from Chris Harvey to Richard Barron 16 re: Fulton County - Machines Down and Polling Places Not Open.	Deposition Exhibit
110	Barron, Richard 2022.01.31 Deposition Exhibit 11 - Withdrawn by counsel	Deposition Exhibit

Exhibit No.	Document Description	Document Type
111	Barron, Richard 2022.01.31 Deposition Exhibit 13 - 8-11-20, E-mail string from Blake Evans to Richard Barron, Dwight Brower, Sharon Benjamin and Johnny Harris re: Elections complaint from Thomas Elliott.	Deposition Exhibit
112	Barron, Richard 2022.01.31 Deposition Exhibit 19 - 9-10-20, E-mail string from Richard Barron to Brigitte Bailey, Gabriel Sterling and Dwight Brower re: Fulton Advance Voting Issue.	Deposition Exhibit
113	Barron, Richard 2022.01.31 Deposition Exhibit 25 - PowerPoint re: Fulton Election Day Issues	Deposition Exhibit
114	Barron, Richard 2022.01.31 Deposition Exhibit 26 - 06.09.2020 E-mail string from Ryan German to Frances Watson and Chris Harvey re: Polling Machine Issue	Deposition Exhibit

Exhibit No.	Document Description	Document Type
115	Barron, Richard 2022.01.31 Deposition Exhibit 27 - 07.16.2020 E-mail string from Richard Barron to Julie Houk and Ryan Germany re: Urgent demands 10 to send corrected absentee ballots to Fulton Co. Voters...	Deposition Exhibit
116	Barron, Richard 2022.01.31 Deposition Exhibit 31 - 12-14- 18, E-mail from Richard Barron to list re: Voting system input from Fulton County, and 1-3-19 E-mail from Joseph Kirk to list re: My thoughts about our next voting system.	Deposition Exhibit
117	Barron, Richard 2022.01.31 Deposition Exhibit 32 (Exhibit Withdrawn by counsel)	Deposition Exhibit
118	Barron, Richard 2022.01.31 Deposition Exhibit 33 - 09.17.19 Email string from Gabriel Sterling to Chris harvey re: Fulton County ExpressPolls	Deposition Exhibit
119	Barron, Richard 2022.01.31 Deposition Exhibit 34 - 11.02.2020, Seven Hills Strategies report re: State Election Board	Deposition Exhibit



Exhibit No.	Document Description	Document Type
120	Barron, Richard 2022.01.31 Deposition Exhibit 35 - 01.12.2021 Seven Hills Strategies reort re: State Election Board - Post Election Executive Summary	Deposition Exhibit
121	Beaver, Merritt 2022.02.22 Deposition Exhibit 1 - Curling Plaintiffs'Second AMD NOD of the Office of the Secretary of State	Deposition Exhibit
122	Beaver, Merritt 2022.02.22 Deposition Exhibit 2 - Declaration of Merritt Beaver	Deposition Exhibit
123	Beaver, Merritt 2022.02.22 Deposition Exhibit 3 - Declaration of S. Merritt Beaver	Deposition Exhibit
124	Beaver, Merritt 2022.02.22 Deposition Exhibit 4 - LinkedIn Printout of Merritt Beaver's profile page	Deposition Exhibit
125	Beaver, Merritt 2022.02.22 Deposition Exhibit 5 - AJC article entitled Case files discredit Kemp's accusation that democrats tried to hack Georgia election	Deposition Exhibit
126	Beaver, Merritt 2022.02.22 Deposition Exhibit 6 - 07.01.2020 email string the with top from Kevin Robertson	Deposition Exhibit
127	Beaver, Merritt 2022.02.22 Deposition Exhibit 7 - Email string dated 12/02/2020 with the top from Kay Stinson	Deposition Exhibit

Exhibit No.	Document Description	Document Type
128	Beaver, Merritt 2022.02.22 Deposition Exhibit 8 - ImageCast X ballot marking device document	Deposition Exhibit
129	Beaver, Merritt 2022.02.22 Deposition Exhibit 9 - Document entitled Information Technology Security Program Charter	Deposition Exhibit
130	Beaver, Merritt 2022.02.22 Deposition Exhibit 10 - Document dated 07.14.2020 entitled Fortalice Solutions Web Vulnerability Remediation Checks Secretary of State Georgia draft	Deposition Exhibit
131	Beaver, Merritt 2022.02.22 Deposition Exhibit 11 - 07.10.2020 Email string with the top from Dave Hamilton	Deposition Exhibit
132	Beaver, Merritt 2022.02.22 Deposition Exhibit 12 - E- mail string with the top from Chris Furtick dated 11.02.2020	Deposition Exhibit
133	Beaver, Merritt 2022.02.22 Deposition Exhibit 13 - 04.05.2019 email string with the top from Kevin Rayburn	Deposition Exhibit
134	Beaver, Merritt 2022.02.22 Deposition Exhibit 14 - 2019.04.03 Email string with the top from Josh Hood	Deposition Exhibit
135	Beaver, Merritt 2022.02.22 Deposition Exhibit 15 - 08.13.2020 email string with the top from Dave Hamilton	Deposition Exhibit

Exhibit No.	Document Description	Document Type
136	Beaver, Merritt 2022.02.22 Deposition Exhibit 16 - 12.30.2020 Email string with the top from Chris Harvey	Deposition Exhibit
137	Beaver, Merritt 2022.02.22 Deposition Exhibit 17 - 12.21.2020 E-mail string with the top from Dave Hamilton	Deposition Exhibit
138	Beaver, Merritt 2022.02.22 Deposition Exhibit 18 - 2020 Security of the voter registration system artifacts and attestation pursuant to Rule 590-8-3-01	Deposition Exhibit
139	Beaver, Merritt 2022.02.22 Deposition Exhibit 19 - 08.21.2020 Email from Dave Hamilton	Deposition Exhibit
140	Beaver, Merritt 2022.02.22 Deposition Exhibit 20 - 12.31.2020 Email string with the top from Angelos Keromytis	Deposition Exhibit
141	Beaver, Merritt 2022.02.22 Deposition Exhibit 21 - 09.17.2020 Email string with the top from Terry Jones	Deposition Exhibit
142	Beaver, Merritt 2022.02.22 Deposition Exhibit 22 - Document entitled Fortalice Rules of Engagement of Georgia Secretary of State Memorandum	Deposition Exhibit
143	Beaver, Merritt 2022.03.10 Deposition Exhibit 23 - 07.29.2020 Email string with the top from Dave Hamilton	Deposition Exhibit

Exhibit No.	Document Description	Document Type
144	Beaver, Merritt 2022.02.22 Deposition Exhibit 24 - 11.12.2020 Email string with the top from Merritt Beaver	Deposition Exhibit
145	Beaver, Merritt 2022.02.22 Deposition Exhibit 25 - 11.03.2020 email Email from Jason Matthews	Deposition Exhibit
146	Beaver, Merritt 2022.03.10 Deposition Exhibit 26 - 08.14.2020 Email string with the top from Kevin Robertson	Deposition Exhibit
147	Beaver, Merritt 2022.02.22 Deposition Exhibit 27 - 03.03.2019 Email string with the top from Merritt Beaver	Deposition Exhibit
148	Beaver, Merritt 2022.02.22 Deposition Exhibit 28 - 08.14.2020 Email from Nick Salsman	Deposition Exhibit
149	Beaver, Merritt 2022.02.22 Deposition Exhibit 29 - 2020.06.15 Document entitled Election Office Notes	Deposition Exhibit
150	Beaver, Merritt 2022.03.10 Deposition Exhibit 1 - 2020.05.19 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia DRAFT	Deposition Exhibit
151	Beaver, Merritt 2022.03.10 Deposition Exhibit 2 - 2020.07.09 Fortalice Solutions Firmware Comparison and Configuration Analysis, Secretary of Sate Georgia, DRAFT	Deposition Exhibit

Exhibit No.	Document Description	Document Type
152	Beaver, Merritt 2022.03.10 Deposition Exhibit 3 - 08.25.2020 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia, DRAFT	Deposition Exhibit
153	Beaver, Merritt 2022.03.10 Deposition Exhibit 4 - 08.25.2020 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia, DRAFT	Deposition Exhibit
154	Beaver, Merritt 2022.03.10 Deposition Exhibit 5 - 08.25.2020 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia, DRAFT	Deposition Exhibit
155	Beaver, Merritt 2022.03.10 Deposition Exhibit 7 - 11.25.2020 Secretary of State Georgia, Fulton County Laptop Forensic Review	Deposition Exhibit
156	Beaver, Merritt 2022.03.10 Deposition Exhibit 8 - Email string	Deposition Exhibit
157	Beaver, Merritt 2022.03.10 Deposition Exhibit 9 - Email String	Deposition Exhibit
158	Beaver, Merritt 2022.03.10 Deposition Exhibit 10 - 07.01.2021 Security Analysis of Georgia's ImageCast X Ballot Marking Devices, Expert Report Submitted on Behalf of Plaintiffs Donna Curling, et al., authored by Prof.J. Alex Halderman,	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Ph.D. with the assistance of Prof. Drew Springall, Ph.D.	
159	Beaver, Merritt 2022.03.10 Deposition Exhibit 11 - Curling Plaintiffs' Fifth AMD NOC of Office of the Secretary of State	Deposition Exhibit
160	Beaver, Merritt 2022.03.10 Deposition Exhibit 12 - CGG Recording	Deposition Exhibit
161	Beaver, Merritt 2022.03.10 Deposition Exhibit 13 - 11.17.2020 Official Election Bulletin, dated November 17, 2020, from Chris Harvey, Elections Division Director, to County Election Officials and County Registrars RE: Open Records Requests - Security Information Exempt	Deposition Exhibit
162	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition Exhibit 1 - Notice of Deposition	Deposition Exhibit
163	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6)	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Deposition- Deposition Exhibit 2 - Objections to NOD	
164	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 3 - Plaintiffs' Third AMD Complaint	Deposition Exhibit
165	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 4 - First Supplemental Complaint of Plaintiffs Coalition for Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett	Deposition Exhibit
166	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 5 - Supplemental Declaration of Marilyn Marks	Deposition Exhibit
167	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 6 - 2017 Form 990-EZ	Deposition Exhibit
168	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 7 - 2018 Form 990	Deposition Exhibit

Exhibit No.	Document Description	Document Type
169	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 8 - 2019 Form 990	Deposition Exhibit
170	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 9 - Plaintiffs' Notice of Filing Declaration	Deposition Exhibit
171	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 10 - Coalition Plaintiffs' Detailed Specification In Support of Motion for Attorneys' Fees	Deposition Exhibit
172	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 11 - New York correspondence from January 2021 citing Curling	Deposition Exhibit
173	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 12 - NCSBOE letter from 2019	Deposition Exhibit
174	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 13 - E-mails, 9/26/19, CGG2021001277506	Deposition Exhibit



Exhibit No.	Document Description	Document Type
175	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 14 - 3/4/21 letter from CGG to Georgia Republican Leaders	Deposition Exhibit
176	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 15 - Mission Statement - Coalition for Good Governance	Deposition Exhibit
177	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 16 - Articles of Incorporation for a Nonprofit Corporation	Deposition Exhibit
178	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 17 - Who We Are - Coalition for Good Governance	Deposition Exhibit
179	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 18 - CGG Board Discussion Package	Deposition Exhibit
180	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Exhibit 19 - Fundraising message	
181	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 20 - Fundraising message during 2020	Deposition Exhibit
182	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 21 - Donate - Coalition for Good Governance	Deposition Exhibit
183	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 22 - Home page - Coalition for Good Governance	Deposition Exhibit
184	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 23 - Current Projects - Coalition for Good Governance	Deposition Exhibit
185	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 24 - Tweets from January 24, 2021	Deposition Exhibit

Exhibit No.	Document Description	Document Type
186	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 25 - 8/22/20 tweet	Deposition Exhibit
187	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 26 - E-mails, 1/18/18 CGG2021001278172	Deposition Exhibit
188	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 27 - Supplemental Response to Rog 12	Deposition Exhibit
189	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 28 -Coalition Plaintiffs' Responses to Defendant Anh Le's First Interrogatories	Deposition Exhibit
190	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 29 - Joint Litigation and Common Interest Agreement	Deposition Exhibit
191	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 30 - Facebook advertisement from Friends	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	of Coalition for Good Governance	
192	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 31 - E-mail regarding ballot image legislation	Deposition Exhibit
193	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 32 - E-mails, 8/24/21, Subject: Garland's new lawsuit against BMDs	Deposition Exhibit
194	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 33 - January 1, 2021 tweet	Deposition Exhibit
195	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 34 - Coalition for Good Governance's and Coalition Plaintiffs' Objections and Responses to Defendant Brad Raffensperger's First Request for Admission	Deposition Exhibit

Exhibit No.	Document Description	Document Type
196	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 35 - 12.30.2020 GA Senate Judiciary Sub-Committee on Election Law	Deposition Exhibit
197	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 36 - Plaintiff Coalition for Good Governance's Objections and Responses to State Defendants' Second Request for Production of Documents	Deposition Exhibit
198	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 37 - Response of Coalition for Good Governance to Brad Raffensperger's First	Deposition Exhibit
199	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 38 - Handwritten notes	Deposition Exhibit
200	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 1 - Notice of Deposition	Deposition Exhibit

Exhibit No.	Document Description	Document Type
201	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 2 - Ms. Missett's Voting Record	Deposition Exhibit
202	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 3 - Declaration of Megan Missett, 10/20/19	Deposition Exhibit
203	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 4 - Declaration of Megan Missett, 5/21/19	Deposition Exhibit
204	2022.01.17 Deposition of James Oliver - Deposition Exhibit 1 - Organization Chart	Deposition Exhibit
205	2022.01.17 Deposition of James Oliver - Deposition Exhibit 2 - LinkedIn Profile of James Oliver	Deposition Exhibit
206	2022.01.17 Deposition of James Oliver - Deposition Exhibit 3 - Fortalice Task Order dated 3/11/21	Deposition Exhibit
207	2022.01.17 Deposition of James Oliver - Deposition Exhibit 4 - Email Chain dated October 2018	Deposition Exhibit
208	2022.01.17 Deposition of James Oliver - Deposition Exhibit 5 - Email Chain dated August 2016	Deposition Exhibit
209	2022.01.17 Deposition of James Oliver - Deposition Exhibit 6 - 2020 Rule 590-8.3 Attestation	Deposition Exhibit
210	2022.01.17 Deposition of James Oliver - Deposition	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Exhibit 7 - Email Chain dated April 2019	
211	2022.01.17 Deposition of James Oliver - Deposition Exhibit 8 - Email Chain dated October 2019	Deposition Exhibit
212	2022.01.17 Deposition of James Oliver - Deposition Exhibit 9 - Email Chain dated July 2019	Deposition Exhibit
213	2022.01.17 Deposition of James Oliver - Deposition Exhibit 10 - Email Chain dated April 2019	Deposition Exhibit
214	2022.01.17 Deposition of James Oliver - Deposition Exhibit 11 - Email dated 4/24/19	Deposition Exhibit
215	2022.01.17 Deposition of James Oliver - Deposition Exhibit 12 - Email Chain dated April 2019	Deposition Exhibit
216	2022.01.21 Deposition of Dominic Olomo - Deposition Exhibit 1 - Curling Plaintiff's Third Amended Notice of Deposition of Fulton County Defendants	Deposition Exhibit
217	2022.01.21 Deposition of Dominic Olomo - Deposition Exhibit 2 - Email string to Tucker from evans 9/29/20	Deposition Exhibit
218	2022.01.21 Deposition of Dominic Olomo - Deposition Exhibit 3 - Email to Harvey from Spell-Forlwer 10/27/20	Deposition Exhibit

Exhibit No.	Document Description	Document Type
219	2022.03.08 Deposition of Donna Price - Exhibit 1 - Notice of Deposition	Deposition Exhibit
220	2022.03.08 Deposition of Donna Price - Exhibit 2 - Georgians for Verified Voting	Deposition Exhibit
221	2022.03.08 Deposition of Donna Price - Exhibit 3 - Voter History File	Deposition Exhibit
222	2022.03.08 Deposition of Donna Price - Exhibit 4 - Third Amended Complaint	Deposition Exhibit
223	2022.03.08 Deposition of Donna Price - Exhibit 6 - Delcaration dated 8/17/18	Deposition Exhibit
224	2022.03.08 Deposition of Donna Price - Exhibit 7 - Declaration dated 5/29/18	Deposition Exhibit
225	2022.03.08 Deposition of Donna Price - Exhibit 8 - Declaration dated 10/4/19	Deposition Exhibit
226	2022.03.08 Deposition of Donna Price - Exhibit 10 - Declaration dated 8/19/20	Deposition Exhibit
227	2022.03.08 Deposition of Donna Price - Exhibit 11 - Declaration dated 2/12/21	Deposition Exhibit
228	2022.03.08 Deposition of Donna Price - Exhibit 12 - Absentee Ballot Report	Deposition Exhibit
229	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 1 - DouglasNow news article, Re: Hampton & Riddlehoover resignation	Deposition Exhibit
230	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 2 - Riddlehoover subpoena	Deposition Exhibit



Exhibit No.	Document Description	Document Type
231	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 3 - Jil Screenshot at 5.19 of Video 2	Deposition Exhibit
232	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 4 - Dominion Voting Machine Flaws -- 2020 Election Coffee County	Deposition Exhibit
233	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 5 - Screenshot 2 (sportcoat)	Deposition Exhibit
234	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 6 - Screenshot of Scott Hall	Deposition Exhibit
235	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 7 - Screenshot of Jennifer Jackson	Deposition Exhibit
236	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 8 - Screenshot of Paul Maggio	Deposition Exhibit
237	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 9 - Screenshot of Doug Logan	Deposition Exhibit
238	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 10 - Screenshot of Greg Freemyer	Deposition Exhibit
239	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 11 - Screenshot of Russ Ramsland	Deposition Exhibit
240	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 12 - Screenshot of Jeffrey Lenberg	Deposition Exhibit
241	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 13 - Screenshot 3	Deposition Exhibit

Exhibit No.	Document Description	Document Type
242	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 14 - Email string from Frances Watson to Pamela Jones, dated May 11, 2021	Deposition Exhibit
243	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 15 - Election Database Memo re: Passwords	Deposition Exhibit
244	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 16 - Misty Hampton Messages with Eric Chaney	Deposition Exhibit
245	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 17 - Text Messages	Deposition Exhibit
246	2022.08.16 Deposition of Jil Riddlehoover - Exhibit 18 - Texts Reveal GOP Mission to Breach Voting Machine in Georgia - Daily Beast	Deposition Exhibit
247	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 1 - Notice of Deposition	Deposition Exhibit
248	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 2 - Verified Complaint	Deposition Exhibit
249	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 3 - Verified Amended Complaint	Deposition Exhibit
250	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 4 - Second Amended Complaint	Deposition Exhibit
251	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 5 - Third Amended Complaint	Deposition Exhibit

Exhibit No.	Document Description	Document Type
252	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 6 - ENET Report	Deposition Exhibit
253	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 7 - Absentee Ballot Report	Deposition Exhibit
254	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 8 - "An Update on Georgia's Election Integrity Lawsuit" 10/11/19	Deposition Exhibit
255	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 9 - "Daniel Blackman Named EC Chair of Sierra Club, Georgia Chapter"	Deposition Exhibit
256	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 10 - Declaration 8/19/20	Deposition Exhibit
257	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 11 - Declaration 8/7/18	Deposition Exhibit
258	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 12 - Email Chain	Deposition Exhibit
259	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 73 - Declaration of Michael Shamos	Deposition Exhibit
260	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 74 - Powerpoint entitled, Cybersecurity Considerations for Voting Systems, Wenke Lee, Ph.D.	Deposition Exhibit

Exhibit No.	Document Description	Document Type
261	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 75 - Cloudbust Security document entitled, Office of the Georgia Secretary of State Cyber Risk Assessment October 2017	Deposition Exhibit
262	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 76 - Fortalice document	Deposition Exhibit
263	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 77 - Diebold in the News - A Partial List of Documented Failures	Deposition Exhibit
264	2022.09.28 Deposition of Robert Sinners - Exhibit 1 - LinkedIn Profile	Deposition Exhibit
265	2022.09.28 Deposition of Robert Sinners - Exhibit 2 - 08122022-000034 through 08122022-000053	Deposition Exhibit
266	2022.09.28 Deposition of Robert Sinners - Exhibit 3 - 08122022-000110 through 08122022-000122	Deposition Exhibit
267	2022.09.28 Deposition of Robert Sinners - Exhibit 4 - 08122022-000162 through 08122022-000174	Deposition Exhibit
268	2022.09.28 Deposition of Robert Sinners - Exhibit 5 - E-mail thread, Harry MacDougald, dated November 10, 2020	Deposition Exhibit

Exhibit No.	Document Description	Document Type
269	2022.09.28 Deposition of Robert Sinners - Exhibit 6 - Email thread from Harry MacDougald, dated November 10, 2020	Deposition Exhibit
270	2022.09.28 Deposition of Robert Sinners - Exhibit 7 - Excerpt of Misty Hampton's messages	Deposition Exhibit
271	2022.09.28 Deposition of Robert Sinners - Exhibit 8 - E-mail from Eric Chaney, November 11, 2020	Deposition Exhibit
272	2022.09.28 Deposition of Robert Sinners - Exhibit 9 - E-mail thread, Tracie Vickers, December 3, 2020	Deposition Exhibit
273	2022.09.28 Deposition of Robert Sinners - Exhibit 10 - E-mail thread, David Shafer, November 20, 2020	Deposition Exhibit
274	2022.09.28 Deposition of Robert Sinners - Exhibit 11 - November 11, 2020 letter to Brad Raffensperger	Deposition Exhibit
275	2022.09.28 Deposition of Robert Sinners - Exhibit 12 - Email Thread to Eric Chaney December 8, 2020	Deposition Exhibit
276	2022.09.28 Deposition of Robert Sinners - Exhibit 13 - December 2, 2020, Misty Hampton e-mailing Sinner re: Trump Campaign	Deposition Exhibit
277	2022.09.28 Deposition of Robert Sinners - Exhibit 14 - December 13, 2020 Sinners text messages with Alex Kaufman	Deposition Exhibit

Exhibit No.	Document Description	Document Type
278	2022.09.28 Deposition of Robert Sinners - Exhibit 15 - Washington Post Article - Fake Trump Electors in Georgia told to Shroud Plans in Secrecy	Deposition Exhibit
279	2022.09.28 Deposition of Robert Sinners - Exhibit 16 - Germany Declaration	Deposition Exhibit
280	2022.09.28 Deposition of Robert Sinners - Exhibit 17 - Raffensperger: Coffee County Probe Stalled Because Local Officials Lied	Deposition Exhibit
281	2022.09.28 Deposition of Robert Sinners - Exhibit 18 - Doug Richards Short Version	Deposition Exhibit
282	2022.09.28 Deposition of Robert Sinners - Exhibit 19 - Questions Raised in Timeline of State Response to Coffee County Breach	Deposition Exhibit
283	2022.09.28 Deposition of Robert Sinners - Exhibit 20 - Questions Raised in Timeline of State Response to Coffee County Breach	Deposition Exhibit
284	2022.09.28 Deposition of Robert Sinners - Exhibit 21 - May 7, 2021 Barnes E-mail Chain re Cyber Ninjas	Deposition Exhibit
285	2022.09.28 Deposition of Robert Sinners - Exhibit 22 - Excerpt from deposition of Michael Ian Shamos	Deposition Exhibit
286	2022.09.28 Deposition of Robert Sinners - Exhibit 23 - MITRE Report	Deposition Exhibit

Exhibit No.	Document Description	Document Type
287	2022.09.28 Deposition of Robert Sinners - Exhibit 24 - May 20, 2021 Sinners Email to Fuchs	Deposition Exhibit
288	2022.09.28 Deposition of Robert Sinners - Exhibit 25 - March 3, 2021 Sinners asked to draft more responses	Deposition Exhibit
289	2022.09.28 Deposition of Robert Sinners - Exhibit 26 - 4/13/22 texts between Sinners and Marshall regarding Sterling Deposition	Deposition Exhibit
290	2022.09.28 Deposition of Robert Sinners - Exhibit 27 - Sinners emails in response to media requests	Deposition Exhibit
291	2022.09.28 Deposition of Robert Sinners - Exhibit 28 - 2021 Convention Resolutions Committee Report	Deposition Exhibit
292	2022.09.28 Deposition of Robert Sinners - Exhibit 29 - Text messages between Sinners and Gardner	Deposition Exhibit
293	2022.09.28 Deposition of Robert Sinners - Exhibit 30 - Pictures, SOS Investigator Visit	Deposition Exhibit
294	2022.09.28 Deposition of Robert Sinners - Exhibit 31 - Kaufman email to Sinners	Deposition Exhibit
295	2022.09.28 Deposition of Robert Sinners - Exhibit 32 - Affidavit of Alyssa Hope Taylor	Deposition Exhibit

Exhibit No.	Document Description	Document Type
296	2022.09.28 Deposition of Robert Sinners - Exhibit 33 - Presidential Findings to Preserve Collect and Analyze National Security Information Regarding the 2020 General election	Deposition Exhibit
297	2022.09.28 Deposition of Robert Sinners - Exhibit 34 - Still Lawsuit	Deposition Exhibit
298	2022.09.28 Deposition of Robert Sinners - Exhibit 35 - Shawn Still Motion	Deposition Exhibit
299	2022.09.28 Deposition of Robert Sinners - Exhibit 36 - O.C.G.A. 21-2-524(b) Certificate of Service of Summons, Petition and Discovery	Deposition Exhibit
300	2022.09.28 Deposition of Robert Sinners - Exhibit 37 - Shawn Still e-mail, December 15, 2020	Deposition Exhibit
301	2022.09.28 Deposition of Robert Sinners - Exhibit 38 - Email from Christina Read, December 10, 2020	Deposition Exhibit
302	2022.09.28 Deposition of Robert Sinners - Exhibit 39 - Email thread, Christina Norton, January 1, 2021	Deposition Exhibit
303	2022.12.16 Deposition of Kevin Skoglund - Exhibit 1 - Skoglund Declaration Confidential	Deposition Exhibit
304	2022.12.16 Deposition of Phillip Stark - Exhibit 1 - Notice of Deposition	Deposition Exhibit



Exhibit No.	Document Description	Document Type
305	2022.12.16 Deposition of Phillip Stark - Exhibit 2 - Supplemental Report 66	Deposition Exhibit
306	2022.12.16 Deposition of Phillip Stark - Exhibit 3 - Tabulating Results	Deposition Exhibit
307	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 1 - Fourt Amended Notice of Deposition	Deposition Exhibit
308	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 2 - LinkedIn Web Page	Deposition Exhibit
309	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 3 - Excerpted pages of "Integrity Counts" By Raffensperger	Deposition Exhibit
310	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 4 - Video excerpts of speech by Gabrial Sterling re: Univeriste de geneve function	Deposition Exhibit
311	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 5 - 7/15/19 State Def's objections and reposos to Curling Plaintiffs' First Set of Interrogatories	Deposition Exhibit
312	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 6 - State Defs' Responses and Objections to Curling Plaintiffs' Second Set of Interrogatories	Deposition Exhibit

Exhibit No.	Document Description	Document Type
313	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 7 - State Defendants Responses to First Requests for Admissions	Deposition Exhibit
314	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 8 - State Defendants 113751	Deposition Exhibit
315	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 9 - State Defendants 172679 thru 686	Deposition Exhibit
316	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 10 - State Defendants 169353	Deposition Exhibit
317	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 11 - State Defendants 192602 thru 603.	Deposition Exhibit
318	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 12 - Audio recording of telephone call.	Deposition Exhibit
319	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 17 - State-Defendants 11151729 thru 781.	Deposition Exhibit
320	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 18 - Dominion Voting brochure re: Mobile ballot printing.	Deposition Exhibit
321	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 19 - Georgia Code 21-2-498	Deposition Exhibit

Exhibit No.	Document Description	Document Type
322	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 20 - Rule 183-1-15-.04	Deposition Exhibit
323	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 21 - Arlo Document regarding Ballot manifest.	Deposition Exhibit
324	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 22 - 11-19-20 - Excel Spreadsheet regarding Arlo Audit report	Deposition Exhibit
325	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 23 - State of Georgia letterhead from Brian Kemp to members of State Election Board regarding 2020 election	Deposition Exhibit
326	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 24 - Audit Board Batch Sheet re: DeKalb Tucker Election Day	Deposition Exhibit
327	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 25 - Audit Board Batch Sheet regarding DeKalb Tucker Library Advance	Deposition Exhibit
328	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 26	Deposition Exhibit
329	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 27 - Audit Board Batch Sheet re: DeKalb 2339 Absentee	Deposition Exhibit

Exhibit No.	Document Description	Document Type
330	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 28 - Audit Board Batch Sheet regarding DeKalb 1956 Absentee	Deposition Exhibit
331	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 29 - Audit Board Batch Sheet regarding DeKalb 1836 Absentee	Deposition Exhibit
332	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 30 - Senators Walker and Blackmon to members of the State Election Board regarding 2020 election	Deposition Exhibit
333	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 31	Deposition Exhibit
334	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 32 - Fox5Atlanta Web Page article regarding Software glitch cuases delay in counting thousands of votes in Gwinnett County	Deposition Exhibit
335	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 33 - Whittier Daily News web page artcile by Conny McCormack - A behind the scenes look at Georgia's vote counting.	Deposition Exhibit
336	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 1 - Plaintiffs Seventh Amended Notice fo Deposition	Deposition Exhibit

Exhibit No.	Document Description	Document Type
337	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 2 - Report of Investigation of Blanchard	Deposition Exhibit
338	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 3 - Photograph from Youtube video of post-it with password	Deposition Exhibit
339	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 4 - Series of tweets by Sterling responding to Adida's tweet	Deposition Exhibit
340	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 5 - 2/10 transcript of Secretary Raffensperger Interview	Deposition Exhibit
341	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 6 - Still photo from the Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022)	Deposition Exhibit
342	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 7 - Email chain ending with 5/11/21 from Watson to Jones	Deposition Exhibit
343	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 8 - Letter from Ellis to Reynolds regarding Request for Assistance in investigation	Deposition Exhibit
344	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 9 - Email chain from Germany to Ellis regarding Server	Deposition Exhibit

Exhibit No.	Document Description	Document Type
345	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 10 - Email chain from sterling to Miller regarding Curling v. Raffensperger; 1:17-CV-2989	Deposition Exhibit
346	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 11 - Email from Germany to ORR administration regarding Open Records Request	Deposition Exhibit
347	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 12 - UTC Message from hampton to Voyles titled ORR	Deposition Exhibit
348	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 13 - Email from Germany to Tyson regarding GASOS ORR	Deposition Exhibit
349	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 14 - Email chain from Koth to Ellis Regarding Opern Records Request	Deposition Exhibit
350	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 15 - Sheet for SEB2020-250-Coffee County Misc	Deposition Exhibit
351	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 16 - Interior stills taken from video camera 1	Deposition Exhibit
352	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 17 - Still shots from video of Coffee County election Board office	Deposition Exhibit

Exhibit No.	Document Description	Document Type
353	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 18 - Tweet by Juha regarding Mike Lindell's Plane Flights	Deposition Exhibit
354	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 19 - Excel Spreadsheet - IP Addresses that have downloaded CC data	Deposition Exhibit
355	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 20 - Email chain from Maggio to Federalattorney regarding Coffee County Forensics FedEx request	Deposition Exhibit
356	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 21 - Email from Brown to Belinfante regarding JSON Format Cast Vote Records on the Internet	Deposition Exhibit
357	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 22 - Email from Johnson to McClain regarding SullivanStrickler / Spalding County Board fo Elections	Deposition Exhibit
358	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 23 - Virtual Videotaped 30(b)(6) Deposition of Sanford Merritt Beaver	Deposition Exhibit
359	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 24 - Rolling Stone Article by Glawe "Pro-Trump Georgia Officials Plotted to Swipe Voting Data. We Caught Them."	Deposition Exhibit

Exhibit No.	Document Description	Document Type
360	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 25 - Official Election Bulletin 11/17/20	Deposition Exhibit
361	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 26 - 12/9/20 Press Release from SOS regarding Opening investigation into Coffee County's handling recount	Deposition Exhibit
362	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 27 - Email from Favorito to Harding regarding Final Ballot inspection plan	Deposition Exhibit
363	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 28 - 5-5-21 Letter, to The Honorable Karen Fann, President, Arizona State Senate, from Karlan, Civil Rights Division, DOJ	Deposition Exhibit
364	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 29 - Dominion Voting, Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System	Deposition Exhibit
365	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 30 - Press Release - MITRE Corporation, an Independent Federal Lab, finds Georgia Election System Secure	Deposition Exhibit



Exhibit No.	Document Description	Document Type
366	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 31 - July 2022 MITRE Document - Independent Technical Review: Security Analysis of Georgia's ImageCast X Ballot Marking Devices	Deposition Exhibit
367	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 32 - E-mail Chain Ending with Wednesday, 8-18-21 12:49 PM E-mail, from Evans, to Johnson, et al., Subject: RE: Spalding County Equipment	Deposition Exhibit
368	2021.11.05 Deposition of Rebecca Sullivan - Exhibit 1 - 2/28/20 Meeint Minutes of SEB	Deposition Exhibit
369	2021.11.05 Deposition of Rebecca Sullivan - Exhibit 2 - Transcript from the SEB hearing on 1/22/20	Deposition Exhibit
370	2021.11.04 Deposition of Matthew Mashburn - Exhibit 1 - Meeting Minutes	Deposition Exhibit
371	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 1 - Subpeona to testify	Deposition Exhibit
372	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 2 - Picture of Jim Nelson	Deposition Exhibit
373	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 3 - Picture of Jennifer Jackson	Deposition Exhibit

Exhibit No.	Document Description	Document Type
374	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 4 - Picture of karuna Naik	Deposition Exhibit
375	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 5 - Picture of Paul Maggio	Deposition Exhibit
376	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 6 - Engagement Agreement 11/30/20	Deposition Exhibit
377	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 7 - Engagement Agreement, MI, AZ, December 6, 2020	Deposition Exhibit
378	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 8 - January 8, 2021 Maggio email chain invoice	Deposition Exhibit
379	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 9 - Phone text message 8/12/22	Deposition Exhibit
380	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 10 - Coffee County Board of Elections and Registration Elections Office Security Video 1/7/21	Deposition Exhibit
381	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 11 - January 8, 2021 from 5pm to 6pm missing video	Deposition Exhibit

Exhibit No.	Document Description	Document Type
382	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 12 - Bates numbers 08122022 000236 to 265	Deposition Exhibit
383	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 13 - Password Memos, 08122022-000123 through 125	Deposition Exhibit
384	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 14 - Maggio hard drive contents	Deposition Exhibit
385	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 15 - 8/17/22 Maggio Production Folder Structure	Deposition Exhibit
386	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 16 - Bates Numbers 08122022-000126 through 136	Deposition Exhibit
387	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 17 - 08122022-000137 through 161	Deposition Exhibit
388	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 18 - Bates Numbers 08122022-000175 through 176	Deposition Exhibit
389	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 19 - Bates Numbers 08122022-000098 through 105	Deposition Exhibit
390	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 20 - Bates Numbers 08122022-000204 through 205	Deposition Exhibit
391	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) -	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Exhibit 21 - Excel Attachment 08122022-000205	
392	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 22 - Bates Numbers 08122022-000022 through 33	Deposition Exhibit
393	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 23 - Maggio-000057 58 Excel	Deposition Exhibit
394	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 24 - May 7, 2021 Barnes e-mail chain re: Cyber Ninjas	Deposition Exhibit
395	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 25 - subpoena	Deposition Exhibit
396	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 26 - STATE-DEFENDANTS-001 01937	Deposition Exhibit
397	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 27 - ICS Advisory Vulnerabilities Affecting Dominion Voting System ImageCast X	Deposition Exhibit
398	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 28 - Copy of Check to Defending the Republic	Deposition Exhibit
399	2022.11.16 Deposition of Blake Voyles - Exhibit 1 - Subpoena	Deposition Exhibit
400	2022.11.16 Deposition of Blake Voyles - Exhibit 2 - Ed	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Voyles November 2020 Election 23 Office Visits	
401	2022.11.16 Deposition of Blake Voyles - Exhibit 3 - CGG20220001857 to 858	Deposition Exhibit
402	2022.11.16 Deposition of Blake Voyles - Exhibit 4 - 1-8-21 e-mail, Voyles to Holmes	Deposition Exhibit
403	2022.11.16 Deposition of Blake Voyles - Exhibit 5 - 11-16-20 e-mail, Hampton to Voyles	Deposition Exhibit
404	2022.11.16 Deposition of Blake Voyles - Exhibit 6 - 12-16-20 e-mail, redacted to bemarkdkerik	Deposition Exhibit
405	2022.11.16 Deposition of Blake Voyles - Exhibit 7 - 12-21-20 e-mail, to Voyles	Deposition Exhibit
406	2022.11.16 Deposition of Blake Voyles - Exhibit 8 - SOS Opens Investigation into Coffee County's Handling recount	Deposition Exhibit
407	2022.11.16 Deposition of Blake Voyles - Exhibit 9 - CGG20220002034 to 035	Deposition Exhibit
408	2022.11.16 Deposition of Blake Voyles - Exhibit 10 - Photographs	Deposition Exhibit
409	2022.11.16 Deposition of Blake Voyles - Exhibit 11 - photographs	Deposition Exhibit
410	2022.11.16 Deposition of Blake Voyles - Exhibit 12 - photographs	Deposition Exhibit

Exhibit No.	Document Description	Document Type
411	2022.11.16 Deposition of Blake Voyles - Exhibit 13 - Rule 183-1-12-.05	Deposition Exhibit
412	2022.11.16 Deposition of Blake Voyles - Exhibit 14 - 3-8-21 text message, Voyles to Marks	Deposition Exhibit
413	2022.11.16 Deposition of Blake Voyles - Exhibit 15 - 2-19-21 combined text messages folder	Deposition Exhibit
414	2022.11.16 Deposition of Blake Voyles - Exhibit 16 - 12-16-20 e-mail, Voyles to Chaney	Deposition Exhibit
415	2022.11.16 Deposition of Blake Voyles - Exhibit 17 - 1-4-21 text message, Thomas	Deposition Exhibit
416	2022.11.16 Deposition of Blake Voyles - Exhibit 18 - 1-7-21 2:19 p.m. photographs	Deposition Exhibit
417	2022.11.16 Deposition of Blake Voyles - Exhibit 19 - 12-7-20 10:28 a.m. photographs	Deposition Exhibit
418	2022.11.16 Deposition of Blake Voyles - Exhibit 20 - 12-8-20 e-mail, Voyles to Foskey	Deposition Exhibit
419	2022.11.16 Deposition of Blake Voyles - Exhibit 21 - 1-6-21 4:17 p.m. photographs	Deposition Exhibit
420	2022.11.16 Deposition of Blake Voyles - Exhibit 22 - 1-8-21 e-mail, Voyles to Holmes	Deposition Exhibit
421	2022.11.16 Deposition of Blake Voyles - Exhibit 23 - 12-8-20 e-mail, Summers to Voyles	Deposition Exhibit

Exhibit No.	Document Description	Document Type
422	2022.11.16 Deposition of Blake Voyles - Exhibit 24 - 12-8-20 e-mail, Voyles to Carden	Deposition Exhibit
423	2022.08.31 Deposition of Edward Lindsey - Exhibit 1 - June 15 Proposed Redactions, Halderman Report	Deposition Exhibit
424	2022.08.31 Deposition of Edward Lindsey - Exhibit 2 - Excerpt from 10/29/2021 Transcript of Juan Gilbert	Deposition Exhibit
425	2022.08.31 Deposition of Edward Lindsey - Exhibit 3 - State-Defendants-00202234	Deposition Exhibit
426	2022.08.31 Deposition of Edward Lindsey - Exhibit 4 - State Defendants 00202239	Deposition Exhibit
427	2022.08.31 Deposition of Edward Lindsey - Exhibit 5 - Article, "Pro-Trump tech team copied Georgia election data, records show"	Deposition Exhibit
428	2022.08.31 Deposition of Edward Lindsey - Exhibit 6 - Video clip, Restoring Elections Panel	Deposition Exhibit
429	2022.08.31 Deposition of Edward Lindsey - Exhibit 7 - May 7, 2021 Barnes E-mail Chain re: Cyber Ninjas	Deposition Exhibit
430	2022.08.31 Deposition of Edward Lindsey - Exhibit 8 - Excerpt from James A. Barnes, Jr. transcript	Deposition Exhibit
431	2022.08.31 Deposition of Edward Lindsey - Exhibit 9 - State Defendants 00205051-53	Deposition Exhibit

Exhibit No.	Document Description	Document Type
432	2022.08.31 Deposition of Edward Lindsey - Exhibit 10 - State Defendants 202613	Deposition Exhibit
433	2022.11.18 Deposition of Doug Logan - Exhibit 1 - 7/27/22 Ichter Davis Letter	Deposition Exhibit
434	2022.11.18 Deposition of Doug Logan - Exhibit 2 - 4/19/21 Board of Selectment Meeting	Deposition Exhibit
435	2022.11.18 Deposition of Doug Logan - Exhibit 3 - Logan Messaging Thread	Deposition Exhibit
436	2022.11.18 Deposition of Doug Logan - Exhibit 4 - Logan Messaging Thread	Deposition Exhibit
437	2022.11.18 Deposition of Doug Logan - Exhibit 5 - Data Log	Deposition Exhibit
438	2022.11.18 Deposition of Doug Logan - Exhibit 6 - SullivanStrickler Log Files	Deposition Exhibit
439	2022.11.18 Deposition of Doug Logan - Exhibit 7 - Photographs	Deposition Exhibit
440	2022.11.18 Deposition of Doug Logan - Exhibit 8 - 1/8/21 Email String From Paul Maggio To Sidney Powell	Deposition Exhibit
441	2022.11.18 Deposition of Doug Logan - Exhibit 9 - screenshot	Deposition Exhibit
442	2022.11.18 Deposition of Doug Logan - Exhibit 10 - Coalition Plaintiffs' Response on Brief on Law Enforcement Investigative	Deposition Exhibit
443	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 1 - subpoena	Deposition Exhibit



Exhibit No.	Document Description	Document Type
444	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 2 - Jeffrey Lenberg Declaration October 21, 2022	Deposition Exhibit
445	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 3 - Logan Signal Messages	Deposition Exhibit
446	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 4 - Harvey Memo on system copies	Deposition Exhibit
447	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 5 - Coffee County ICC & ICP Reports	Deposition Exhibit
448	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 6 - Coffee County and Pierce County Records Request	Deposition Exhibit
449	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 7 - Color photograph, Cellebrite kit for copying	Deposition Exhibit
450	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 8 - Measuring the desk message	Deposition Exhibit
451	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 9 - Color photograph, Lenberg light ring	Deposition Exhibit
452	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 11 - Color photograph, pictures coming	Deposition Exhibit
453	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 12 - ICP - Analysis - Updated, Dominion 5.5	Deposition Exhibit

Exhibit No.	Document Description	Document Type
454	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 13 - handwritten notes	Deposition Exhibit
455	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 14 - Thumb drive contents - CCBOE Docs responsive to subpoenas	Deposition Exhibit
456	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 15 - Ben Cotton Signal & Coffee County related emails	Deposition Exhibit
457	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 16 - Moncla Signal Communications Annotated	Deposition Exhibit
458	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 17 - Lenberg vote stealing attack	Deposition Exhibit
459	2019.07.24 Deposition of Lynn Ledford - Exhibit 1 - Notice of Deposition	Deposition Exhibit
460	2019.07.24 Deposition of Lynn Ledford - Exhibit 2 - Subpoena	Deposition Exhibit
461	2019.07.24 Deposition of Lynn Ledford - Exhibit 3 - E-mail from Ms. Black 6/21/19 regarding provisional ballots	Deposition Exhibit
462	2019.07.24 Deposition of Lynn Ledford - Exhibit 4 - Voter Comments and Concerns Forms	Deposition Exhibit
463	2019.07.24 Deposition of Lynn Ledford - Exhibit 5 - Intergovernmental agreement	Deposition Exhibit
464	2019.07.24 Deposition of Lynn Ledford - Exhibit 6 - Creating	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	and saving export File in GEMS	
465	2019.07.24 Deposition of Lynn Ledford - Exhibit 7 - OEB	Deposition Exhibit
466	2019.07.24 Deposition of Lynn Ledford - Exhibit 8 - Election Related files	Deposition Exhibit
467	2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018	Deposition Exhibit
468	2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County March 1, 2016	Deposition Exhibit
469	2019.07.24 Deposition of Lynn Ledford - Exhibit 11 - E-mail from Mr. Newby 8/23/16	Deposition Exhibit
470	2019.07.24 Deposition of Lynn Ledford - Exhibit 12 - Declaration	Deposition Exhibit
471	2019.07.24 Deposition of Lynn Ledford - Exhibit 13 - Declaration	Deposition Exhibit
472	2019.07.24 Deposition of Lynn Ledford - Exhibit 14 - Declaration	Deposition Exhibit
473	2019.07.24 Deposition of Lynn Ledford - Exhibit 15 - Election Results Report	Deposition Exhibit
474	2019.07.24 Deposition of Lynn Ledford - Exhibit 16 - Election Results Report	Deposition Exhibit
475	2019.07.24 Deposition of Lynn Ledford - Exhibit 17 - Gwinnett County Election Day Manager manual	Deposition Exhibit

Exhibit No.	Document Description	Document Type
476	2019.07.24 Deposition of Lynn Ledford - Exhibit 18 - OEB January 30, 2019	Deposition Exhibit
477	2019.07.24 Deposition of Lynn Ledford - Exhibit 19 - Ballot Image Report	Deposition Exhibit
478	2021.11.4 Deposition of Anh Le - Exhibit 1 - Minutes	Deposition Exhibit
479	2022.08.08 Deposition of Cathleen Latham - Exhibit 1 - Subpoena	Deposition Exhibit
480	2022.08.08 Deposition of Cathleen Latham - Exhibit 2 - Subpoena	Deposition Exhibit
481	2022.08.08 Deposition of Cathleen Latham - Exhibit 3 - Screenshot from Hampton Video	Deposition Exhibit
482	2022.08.08 Deposition of Cathleen Latham - Exhibit 4 - Letter dated 12/23/20 re Notice of Obligation to preserve documents related to dominion	Deposition Exhibit
483	2022.08.08 Deposition of Cathleen Latham - Exhibit 5 - Draft executive order dated 12/16/20 from President Trump	Deposition Exhibit
484	2022.08.08 Deposition of Cathleen Latham - Exhibit 6 - iPhone text message string screenshots	Deposition Exhibit
485	2022.08.23 Deposition of Janice Johnston - Exhibit 1 - Plaintiffs' Identification of Outstanding Discovery Disputes	Deposition Exhibit

Exhibit No.	Document Description	Document Type
486	2022.08.23 Deposition of Janice Johnston - Exhibit 2 - Security Analysis of Georgia's ImageCast X BMDs	Deposition Exhibit
487	2022.08.23 Deposition of Janice Johnston - Exhibit 3 - Excerpt testimony from Videotaped videoconference deposition of Juan Gilbert	Deposition Exhibit
488	2022.08.23 Deposition of Janice Johnston - Exhibit 4 - Activity Alert: ICSA-22-XXX-XX Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit
489	2022.08.23 Deposition of Janice Johnston - Exhibit 5 - Key Photos from production	Deposition Exhibit
490	2022.08.23 Deposition of Janice Johnston - Exhibit 6 - People who have downloaded CC data	Deposition Exhibit
491	2022.08.23 Deposition of Janice Johnston - Exhibit 7 - Declaration of Benjamin R. Cotton	Deposition Exhibit
492	2022.08.23 Deposition of Janice Johnston - Exhibit 8 - May 7, 2021 Barnes' E-mail chain re: Cyber Ninjas	Deposition Exhibit
493	2022.08.23 Deposition of Janice Johnston - Exhibit 9 - Excerpt from the deposition of James A. Barnes	Deposition Exhibit
494	2022.08.23 Deposition of Janice Johnston - Exhibit 10 - E-mail string, Renewed Letter Petition to State	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Election Board, dated June 6, 2022, at 10:50 a.m.	
495	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 1 - October 27, 2021 email chain	Deposition Exhibit
496	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 2 - ICS Advisory, "Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit
497	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 3 - April/May 2021 email chain with attachment	Deposition Exhibit
498	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 4 - April/May 2021 email chain	Deposition Exhibit
499	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 5 - Photo of Post-it note	Deposition Exhibit
500	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 6 - May 2021 email chain with attachment	Deposition Exhibit
501	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 7 - Coffee County Board of Elections and Registration Monthly Board Meeting, April 13, 2021, 9:30 AM	Deposition Exhibit
502	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 8 - Invoice dated 4/13/2021	Deposition Exhibit
503	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 4 -	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	State-Defendants-00113529 - 113530	
504	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 5 - State-Defendants-00108790 - 00108791	Deposition Exhibit
505	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 6 - State-Defendants-00110732-00110734	Deposition Exhibit
506	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 7 - E-mail string to Brower and others from Cummings, 10/22/2020 State-Defendants-00169113 - 00169114	Deposition Exhibit
507	2023.01.03 Deposition of Alex Halderman - Exhibit 1 - 12-20-22, State Defendants' Notice to Take the Second Expert Desposition of Alex Halderman	Deposition Exhibit
508	2023.01.03 Deposition of Alex Halderman - Exhibit 2 - Declaration of Alex Halderman Re: The Above-captioned action.	Deposition Exhibit
509	2021.10.21 Deposition of Juan Gilbert - Exhibit 1 - Declaration of Juan Gilbert	Deposition Exhibit
510	2021.10.21 Deposition of Juan Gilbert - Exhibit 2 - Document Entitled "Georgia Voter Verification Study"	Deposition Exhibit
511	2021.10.21 Deposition of Juan Gilbert - Exhibit 3 - United States Patent, No. US 11.036,442 B2	Deposition Exhibit

Exhibit No.	Document Description	Document Type
512	2021.10.21 Deposition of Juan Gilbert - Exhibit 4 - Article entitled "Why computer scientists prefer paper ballots"	Deposition Exhibit
513	2021.10.21 Deposition of Juan Gilbert - Exhibit 5 - Document labeled "Exhibit A"	Deposition Exhibit
514	2021.10.21 Deposition of Juan Gilbert - Exhibit 6 - E-mail string, top e-mail to Scott Tucker from Michael Barnes	Deposition Exhibit
515	2021.10.21 Deposition of Juan Gilbert - Exhibit 7 - Twitter page	Deposition Exhibit
516	2021.10.21 Deposition of Juan Gilbert - Exhibit 8 - Letter to Juan E. Gilbert, Ph.D. from Bryan P. Tyson, dated 11-8-19	Deposition Exhibit
517	2021.10.21 Deposition of Juan Gilbert - Exhibit 9 - Trial transcript, dated 3-24-09	Deposition Exhibit
518	2021.11.05 Deposition of Sarah Ghazal - Exhibit 1 - Tweet by Sara Ghazal, Dated 2/28/20	Deposition Exhibit
519	2021.11.05 Deposition of Sarah Ghazal - Exhibit 2 - email chain	Deposition Exhibit
520	2021.11.05 Deposition of Sarah Ghazal - Exhibit 3 - STATE-DEFENDANTS-00201663 through -1664	Deposition Exhibit
521	2021.11.05 Deposition of Sarah Ghazal - Exhibit 4 - Tweet by Sara Ghazal, Dated 2/28/2020	Deposition Exhibit



Exhibit No.	Document Description	Document Type
522	2021.11.05 Deposition of Sarah Ghazal - Exhibit 5 - Tweet by Sara Ghazal	Deposition Exhibit
523	2022.01.18 Deposition of David Hamilton - Exhibit 1 - Email Chain, FORTALICE001200 through - 001201	Deposition Exhibit
524	2022.01.18 Deposition of David Hamilton - Exhibit 2 - LinkedIn Profile of David Hamilton	Deposition Exhibit
525	2022.01.18 Deposition of David Hamilton - Exhibit 3 - Email Chain dated August 2016, Bates Numbers FORTALICE000002952 through -2953	Deposition Exhibit
526	2022.01.18 Deposition of David Hamilton - Exhibit 4 - Fortalice Red Team Penetration Test and Cyber Risk Assessment Report for State of Georgia, Office of the Secretary of State, November 2018, Bates Numbers Payton 000070 through -000119	Deposition Exhibit
527	2022.01.18 Deposition of David Hamilton - Exhibit 5 - Declaration of David Hamilton	Deposition Exhibit
528	2022.01.18 Deposition of David Hamilton - Exhibit 6 - Task order from Fortalice to the Secretary of State's office dated March 11, 2021, Bates Numbers	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	FORTALICE000001 through - 2	
529	2022.01.18 Deposition of David Hamilton - Exhibit 7 - Weekly Updates from Fortalice to the Secretary of State's Office, Bates Numbers FORTALICE002781 through -2788	Deposition Exhibit
530	2022.01.18 Deposition of David Hamilton - Exhibit 8 - Email Chain, Bates Numbers STATE-DEFENDANTS-00126678 through -126682	Deposition Exhibit
531	2022.01.18 Deposition of David Hamilton - Exhibit 9 - Email Chain, Bates Numbers STATE-DEFENDANTS-00126696 through -126698	Deposition Exhibit
532	2022.01.18 Deposition of David Hamilton - Exhibit 10 - News Article, "UPDATE: Ransomware Attackers Hit Hall County Election Infrastructure, dated October 23, 2020	Deposition Exhibit
533	2022.01.18 Deposition of David Hamilton - Exhibit 11 - Email Chain, Bates Number STATE-DEFENDANTS-00104972	Deposition Exhibit
534	2022.01.18 Deposition of David Hamilton - Exhibit 12 - Email Chain, Bates Numbers STATE-DEFENDANTS-	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	00158821 through -158822	
535	2022.01.18 Deposition of David Hamilton - Exhibit 13 - Election Office Notes, 10 AM 6/15/20 Meeting, Bates Numbers STATE-DEFENDANTS-00158823 through -158825	Deposition Exhibit
536	2022.01.18 Deposition of David Hamilton - Exhibit 14 - Email Chain, Bates Numbers STATE-DEFENDANTS-00171971 through -171973	Deposition Exhibit
537	2022.01.18 Deposition of David Hamilton - Exhibit 15 - Email Chain, Bates Numbers FORTALICE001209 through -1212	Deposition Exhibit
538	2022.01.18 Deposition of David Hamilton - Exhibit 16 - Supplemental Declaration of David Hamilton	Deposition Exhibit
539	2022.01.18 Deposition of David Hamilton - Exhibit 17 - Email Chain, Bates Numbers STATE-DEFENDANTS-00126614 through -126616	Deposition Exhibit
540	2022.01.18 Deposition of David Hamilton - Exhibit 18 - Email Chain, Bates Numbers FORTALICE001163 through FORTALICE001166	Deposition Exhibit

Exhibit No.	Document Description	Document Type
541	2022.01.18 Deposition of David Hamilton - Exhibit 19 - Report from Fortalice Solutions dated July 14, 2020, Bates Numbers FORTALICE000625 through - 629	Deposition Exhibit
542	2022.01.18 Deposition of David Hamilton - Exhibit 20 - Email from David Hamilton dated 4/29/2021, Bates Number STATE-DEFENDANTS-00170625	Deposition Exhibit
543	2022.01.18 Deposition of David Hamilton - Exhibit 21 - Email from Dave Hamilton dated 8/21/2020, Bates Number STATE-DEFENDANTS-00161203	Deposition Exhibit
544	2022.01.18 Deposition of David Hamilton - Exhibit 22 - Document, Bates Numbers STATE-DEFENDANTS-00161204.xl sx through -161204.xlsx	Deposition Exhibit
545	2022.01.18 Deposition of David Hamilton - Exhibit 23 - Document Titled "2020 Security of the Voter Registration System Artifacts and Attestation Pursuant to Rule 590-8-3-.01" dated December 18, 2020, Bates Numbers STATE-DEFENDANTS-00182171 through -00182214	Deposition Exhibit

Exhibit No.	Document Description	Document Type
546	2022.01.18 Deposition of David Hamilton - Exhibit 24 - Email Chain, Bates Numbers STATE-DEFENDANTS-00182118 through -182120	Deposition Exhibit
547	2022.11.11 Deposition of Misty Hampton - Exhibit 1 - Article, Secretary of State's Office Opens Investigation into Coffee County's Handling Recount	Deposition Exhibit
548	2022.11.11 Deposition of Misty Hampton - Exhibit 2 - Text string messages, Gary with Dominion	Deposition Exhibit
549	2022.11.11 Deposition of Misty Hampton - Exhibit 3 - String of text messages with Eric Chaney	Deposition Exhibit
550	2022.11.11 Deposition of Misty Hampton - Exhibit 4 - String of text messages between Misty Hampton and Eric Chaney	Deposition Exhibit
551	2022.11.11 Deposition of Misty Hampton - Exhibit 5 - Chart of "Confidential" text messages	Deposition Exhibit
552	2022.11.11 Deposition of Misty Hampton - Exhibit 6 - Messages - Andy Thomas & Ernestine Thomas-Clark and Eric Chaney and Matthew McC and Wendell Stone	Deposition Exhibit
553	2022.11.11 Deposition of Misty Hampton - Exhibit 7 - E-mail from Misty Hampton	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	to Open Records Request, dated March 31, 2021	
554	2022.11.11 Deposition of Misty Hampton - Exhibit 8 - Time sheet review	Deposition Exhibit
555	2022.11.11 Deposition of Misty Hampton - Exhibit 9 - Text messages from James Dom tech	Deposition Exhibit
556	2022.11.11 Deposition of Misty Hampton - Exhibit 10 - Misty video production - CCBOE responses to Plaintiffs subpoenas	Deposition Exhibit
557	2022.11.11 Deposition of Misty Hampton - Exhibit 11 - Lindell lands in Douglas	Deposition Exhibit
558	2022.11.11 Deposition of Misty Hampton - Exhibit 12 - Shawn Still Complaint	Deposition Exhibit
559	2022.11.11 Deposition of Misty Hampton - Exhibit 13 - Misty Hampton e-mailing Robert Sinners' Personal Email	Deposition Exhibit
560	2022.11.11 Deposition of Misty Hampton - Exhibit 14 - E-mail from Christina Read, Thursday, December 10, 2020	Deposition Exhibit
561	2022.11.11 Deposition of Misty Hampton - Exhibit 15 - Misty Hampton e-mails from other county users	Deposition Exhibit
562	2022.11.11 Deposition of Misty Hampton - Exhibit 16 - Photograph of password for 2020 Election	Deposition Exhibit

Exhibit No.	Document Description	Document Type
563	2022.11.11 Deposition of Misty Hampton - Exhibit 17 - Photograph, Miles Latham on January 7	Deposition Exhibit
564	2022.11.11 Deposition of Misty Hampton - Exhibit 18 - Photograph of young man walking to building	Deposition Exhibit
565	2022.11.11 Deposition of Misty Hampton - Exhibit 19 - Photograph, Alex Cruce, on January 7	Deposition Exhibit
566	2022.11.11 Deposition of Misty Hampton - Exhibit 20 - Photograph of Misty's office, GEMS room	Deposition Exhibit
567	2022.11.11 Deposition of Misty Hampton - Exhibit 21 - Series of photographs	Deposition Exhibit
568	2022.11.11 Deposition of Misty Hampton - Exhibit 22 - Still shots from DouglasNow YouTube video	Deposition Exhibit
569	2022.11.11 Deposition of Misty Hampton - Exhibit 23 - EMS computer password	Deposition Exhibit
570	2022.11.11 Deposition of Misty Hampton - Exhibit 24 - Photograph, Coffee County GEMS password	Deposition Exhibit
571	2022.11.11 Deposition of Misty Hampton - Exhibit 25 - Photograph, (exterior only) Lenberg - January 27, 28, 29	Deposition Exhibit
572	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 1 - 1-26-22, Curling Plaintiffs' Second Amended Notice of Deposition	Deposition Exhibit

Exhibit No.	Document Description	Document Type
573	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 2 - LinkedIn profile re: Chris Harvey	Deposition Exhibit
574	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 3	Deposition Exhibit
575	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 4 - State Defendants 101460 thru 461, 11-6-20, E-mail string from Chris Harvey to Frances Watson re: Violation.	Deposition Exhibit
576	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 5 - State Defendants 101471 thru 473, 11-10-20, E-mail string from Chris Harvey to Frances Watson re: Security seals on B.M.D.s.	Deposition Exhibit
577	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 6 - State Defendants 108321, 10-10-20, E-mail from David Worley to Chris Harvey re: Hall County.	Deposition Exhibit
578	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 7 - State Defendants 108787 thru 788, 5-28-20, E-mail string from Chris Harvey to George Gray re: Board of Elections.	Deposition Exhibit



Exhibit No.	Document Description	Document Type
579	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 8 - State Defendants 110230 thru 231, 10-15-20, E-mail string from Carol Heard to Chris Harvey re: Threat assessment.	Deposition Exhibit
580	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 9 - State Defendants 115480 thru 482, 10-30-19, E-mail string from Deb Cox to Chris Harvey re: Encoding a supplemental voter.	Deposition Exhibit
581	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 10 - State Defendants 117430 thru 431, 2-25-21, E-mail string Chris Harvey from Jordan Fuchs re: Security sensitive FW: Call follow-up.	Deposition Exhibit
582	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 11 - State Defendants 139190 thru 192, 4-5-19, E-mail string from Kevin Rayburn to Jordan Fuchs re: I bet I can hack your electronic voting machines.	Deposition Exhibit
583	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 12 - Fortalice 1209 thru 1212, 11-2-20, E-mail string from Chris Furtick to Roy Iversen re: Computer accessed remotely.	Deposition Exhibit

Exhibit No.	Document Description	Document Type
584	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 13 - Dominion 69648, 9-25-20, Chris Harvey Post to The Buzz re: Very important announcement concerning databases.	Deposition Exhibit
585	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 14 - Dominion 72216, 10-19-20, E-mail from Scott Tucker to list re: GA advanced voting.	Deposition Exhibit
586	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 15 - Dominion 73354, 11-8-20, E-mail string from Kay Stimson to Jen Daulby re: Voting issue in Georgia.	Deposition Exhibit
587	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 16 - Dominion 74766 thru 769, 11-17-20, E-mail string from Chris Harvey to Scott Tucker and David Greenwalt re: Update to firewall rules for Meraki MDM for poll pads, attached.	Deposition Exhibit
588	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 17 - Dominion 74784 thru 785, 11-17-20, E-mail string from Scott Tucker to Chris Harvey re: memory cards	Deposition Exhibit

Exhibit No.	Document Description	Document Type
589	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 18 - Dominion 76086 thru 088, 1-7-21, E-mail string from Tom Feehan to Blake Evans and Scott Tucker re: We have a problem.	Deposition Exhibit
590	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 19 - State Defendants 2000997 thru 201000, 7-16-19, E-mail string from Ryan Germany to Brad Raffensperger, Jordan Fuchs and Merritt Beaver re: N.A.S.S. elections committee NormShield press release/score card on State Web site security.	Deposition Exhibit
591	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 20 - State Defendants 165630 thru 632, 12-31-20, E-mail string from Angelos Keromytis to Jordan Fuchs re: Election machine hack?	Deposition Exhibit
592	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 1 - O.C.G.A. Section 21-2-379.22 re: Requirements for electronic ballot marking.	Deposition Exhibit
593	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 4 - 10-12-20, Reuters color photograph of presidential elections early voting at State Farm Arena.	Deposition Exhibit

Exhibit No.	Document Description	Document Type
594	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 12 - Secure the Vote PowerPoint re: Precinct Layout to Aid with Privacy Training.	Deposition Exhibit
595	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 14 - 12-1-20, State of Georgia Official Election Bulletin from Chris Harvey to County election officials and county registrars re: Preserving ballot images and delivering to Sec. of State.	Deposition Exhibit
596	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 16 - Rockdale 924, 6-11-20, E-mail from Cynthia Willingham to Scott Tucker, Chris Harvey and Kevin Rayburn re: Additional training needed - tech and regional manager.	Deposition Exhibit
597	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 1 - 6-30-22, Subpoena to Produce Documents, Information or Objects or to Permit Inspection of Premises in a Civil Action to Eric B. Chaney re: The above-captioned action.	Deposition Exhibit

Exhibit No.	Document Description	Document Type
598	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 2 - 8-5-22, Subpoena to Produce Documents, Information or Objects or to Permit Inspection of Premises in a Civil Action to Eric B. Chaney re: The above-captioned action.	Deposition Exhibit
599	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 3 - 8-14-22, Chaney Response to CGG Subpoena for Production of Documents re: Curling v. Kemp.	Deposition Exhibit
600	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 4 - State Defendants 202100 thru 103, 9-28-21, State of Georgia Secretary of State, Investigations Division Summary re: Coffee County.	Deposition Exhibit
601	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 5 - Color photograph of computer/keyboard with Post-It note.	Deposition Exhibit
602	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 6 - Latham 24 thru 53, Compilation exhibit re: Coffee County Board of Elections documents.	Deposition Exhibit

Exhibit No.	Document Description	Document Type
603	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 7 - 10-6-20 thru 5-3-22, Coffee County Board of Elections and Registration Regular Monthly Meeting Minutes.	Deposition Exhibit
604	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 8 - 4-12-22, E-mail string from Jennifer Dorminey Herzog to Ryan Germany re: Response to 4-12-22 Emma Brown Washington Post inquiry.	Deposition Exhibit
605	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 9 - 3-15-18 thru 3-1-21, text message string between Eric Chaney and Misty Hampton.	Deposition Exhibit
606	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 10 - 8122022-34 thru -53, 1-8-21, E-mail string from Paul Maggio to Sidney Powell re: Jim Penrose-Coffee County GA forensics engagement agreement.	Deposition Exhibit
607	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 11 - 6-3-22, ICS Advisory re: Vulnerabilities affecting Dominion Voting Systems ImageCast X.	Deposition Exhibit

Exhibit No.	Document Description	Document Type
608	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 12 - LinkedIn Web page print-out re: Robert A. Sinners.	Deposition Exhibit
609	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 13 - 12-12-20, Verified Petition for Emergency Injunctive and Declaratory Relief re: Still v. Raffensperger.	Deposition Exhibit
610	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 1 - 8-25-22 Subpoena to Testify At A Deposition in a Civil Action, Coffee County Board of Elections & Registration	Deposition Exhibit
611	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 2 - 1-7-21 and 1-8-21 -- Three Screen Shots From Video of Two Men Entering Office Carrying/Pulling Items	Deposition Exhibit
612	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 3 - Screen Shots from Camera 1 1-7-21	Deposition Exhibit
613	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 4 - E-mail Chain Ending with Tuesday, May 11, 2021 3:30 PM E-mail, from Watson, to Jones, Subject: Fwd: Coffee County	Deposition Exhibit

Exhibit No.	Document Description	Document Type
614	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 5 - 5-6-21 Dominion Voting, Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System, CONFIDENTIAL, STATE-DEFENDANTS-00101937	Deposition Exhibit
615	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 6 - A Series of Photographs Showing Compact Flash Cards with Handwritten Tags, Flash Drives, Etc., 08122022-000236-265	Deposition Exhibit
616	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 7 - Screen Shots from Camera 1 on 1-27-21 Through 1-29-21	Deposition Exhibit
617	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 8 - 1-28-21 and 1-29-21 Screen Shots of Individuals Entering and Leaving the Elections Office	Deposition Exhibit
618	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 9 - Two Photographs of Jeffrey Lenberg	Deposition Exhibit



Exhibit No.	Document Description	Document Type
619	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 10 - Composite Exhibit of Coffee County Board of Elections and Registration Board Meeting Minutes Beginning with 10-6-20	Deposition Exhibit
620	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 11 - 8/12/22 12:20 PM (GMT-05:00) E-mail, from Chaney, to Thomas-Clark, et al., Subject: Coffee Co Board of Elections	Deposition Exhibit
621	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 12 - Typewritten Sheet Beginning: 3.4.22 (3) All documents, including communications...; E-mail Chain Ending with Tuesday, 4-12-20 3:50 PM E-mail, from Herzog, to Germany, Subject: FW: Response to 4/12/22 Emma Brown Washington Post inquiry	Deposition Exhibit
622	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 13 - Photograph of Voyles and Eric Chaney Sitting at a Table with Laptop in Elections Office	Deposition Exhibit

Exhibit No.	Document Description	Document Type
623	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 14 - Messages - Eric Chaney (With Hampton) Beginning 3/15/18 7:40 PM	Deposition Exhibit
624	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 15 - Messages - Andy Thomas & Ernestine Thomas-Clark & Eric Chaney & Matthew McC & Wendell Stone, Beginning with 1-4-12 7:21 PM Text	Deposition Exhibit
625	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 16 - 2-25-21 Resignation Letter, from Ridlehoover, to Board of Elections Chairperson	Deposition Exhibit
626	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 17 - 2-25-21 Resignation Letter, from Hampton, to Board of Elections Chairperson	Deposition Exhibit
627	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 18 - Juha, Keskinen (@MacFinn44), TWITTER (Feb. 26, 2021, 6:05 PM) Twitter Post	Deposition Exhibit
628	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 19 - Text Message Between Hampton and Rowell	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	(Withdrawn to Attorney-Client Privilege)	
629	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 20 - Message # 249 - From Vickers, to Hampton, Subject: FW [EXTERNAL]Re: Open Records Request	Deposition Exhibit
630	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 21 - Summary, Dyanna Hours Claimed Period 11-16-20 - 2-19-21	Deposition Exhibit
631	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 22 - Screen Shots from Camera 1 1-8-21 Man Leaving with Equipment	Deposition Exhibit
632	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 23 - E-mail Chain Ending with Thursday, 7-15-21 1:57 PM E-mail, from Hampton, to Vickers, Subject: Re: Open Records Request	Deposition Exhibit
633	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 24 - 4-12-22 Letter, to Marks, from Herzog, Consolidation of Outstanding Open Records Requests	Deposition Exhibit

Exhibit No.	Document Description	Document Type
634	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 25 - 1-8-21 3:48:30 PM E-mail, from Maggio, to Powell, Subject: RE: SSA1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement, 08122022-000034 - 53	Deposition Exhibit
635	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 26 - 11-30-20 SullivanStrickler Engagement Agreement Forensic Analysis, 08122022-000110 - 122	Deposition Exhibit
636	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 27 - SSA1722 HARD DRIVE CONTENTS	Deposition Exhibit
637	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 28 - Spreadsheet of E-mail Addresses with Access to Coffee County Data, 08122022-000126-136	Deposition Exhibit
638	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 29 - Spreadsheet of IP Addresses That Have Downloaded Coffee County Data, 08122022-000137-161	Deposition Exhibit

Exhibit No.	Document Description	Document Type
639	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 30 - CISA - ICS Advisory (ICSA-22-154-01) Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit
640	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 31 - 12-17-20 Still v. Raffensperger Lawsuit, Verified Petition for Emergency Injunctive and Declaratory Relief	Deposition Exhibit
641	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Defendants' Exhibit 1 - Ga Comp. R. & Regs. 183-1-12-.04, 183-1-12-.04. Storage, Maintenance, and Transport of Statewide Voting System Components	Deposition Exhibit
642	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Defendants' Exhibit 2 - 1-7-21 Screen Shots of Men Entering Front Door of Elections Office with Equipment	Deposition Exhibit
643	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Defendants' Exhibit 3 - E-mail Chain Ending with Friday, May 7, 2021 1:51:10 PM E-mail, from Germany, to Feehan, et al., Subject: RE: [EXTERNAL] RE: Dominion notice to Customers re: Chain	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	of Custody, Ending Dominion 089394	
644	9.29.2021 Deposition of Ricardo Davis - Exhibit 1 - Notice of Deposition	Deposition Exhibit
645	9.29.2021 Deposition of Ricardo Davis - Exhibit 2 - Declaration Filed 10/23/19	Deposition Exhibit
646	9.29.2021 Deposition of Ricardo Davis - Exhibit 3 - Mr. Davis voting record	Deposition Exhibit
647	9.23.2021 Deposition of Laura Digges - Exhibit 1 - Notice of Deposition	Deposition Exhibit
648	9.23.2021 Deposition of Laura Digges - Exhibit 2 - CBS46 News article	Deposition Exhibit
649	9.23.2021 Deposition of Laura Digges - Exhibit 3 - CGG's and Coalition's Objections and Responses to Raffensperger's First Req. for Admissions	Deposition Exhibit
650	9.23.2021 Deposition of Laura Digges - Exhibit 4 - ENET Report	Deposition Exhibit
651	9.23.2021 Deposition of William Digges III - Exhibit 1 - Notice of Deposition	Deposition Exhibit
652	9.23.2021 Deposition of William Digges III - Exhibit 2 - ENET Report	Deposition Exhibit
653	9.23.2021 Deposition of William Digges III - Exhibit 3	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	- Coalition Statement on William Diggs	
654	9.23.2021 Deposition of William Digges III - Exhibit 4 -Declaration of William Diggs, III dated October 20, 2019	Deposition Exhibit
655	9.23.2021 Deposition of William Digges III - Exhibit 5 - Bullet Point Sheet	Deposition Exhibit
656	6.28.2019 Deposition of Jennifer Doran - Exhibit 32 - Subpoena	Deposition Exhibit
657	6.28.2019 Deposition of Jennifer Doran - Exhibit 33 - Direct Record Electronic Voting Machine Recap	Deposition Exhibit
658	6.28.2019 Deposition of Jennifer Doran - Exhibit 34 - Ballot Image Report	Deposition Exhibit
659	6.28.2019 Deposition of Jennifer Doran - Exhibit 35 - Official Election Bulletin	Deposition Exhibit
660	6.28.2019 Deposition of Jennifer Doran - Exhibit 36 - 11.26.2018 General Election Undervote Information	Deposition Exhibit
661	6.28.2019 Deposition of Jennifer Doran - Exhibit 37 - Rockdale County Board of Election Voting Equipment Issues	Deposition Exhibit
662	9.22.2022 Deposition of Dean Felicetti - Exhibit 1 - Subpoena to Testify at a Civil Action	Deposition Exhibit
663	9.22.2022 Deposition of Dean Felicetti - Exhibit 2 - Picture of Jim Nelson, Senior System	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Engineer at Sullivan Strickler LLC	
664	9.22.2022 Deposition of Dean Felicetti - Exhibit 3 - Picture of Jennifer Jackson, Senior System Enngineer at Sullivan Strickler LLC	Deposition Exhibit
665	9.22.2022 Deposition of Dean Felicetti - Exhibit 4 - Picture of Karuna Naik, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit
666	9.22.2022 Deposition of Dean Felicetti - Exhibit 5 - Picture of Paul Maggio, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit
667	9.22.2022 Deposition of Dean Felicetti - Exhibit 6 - Engagement Agreement, November 30, 2020	Deposition Exhibit
668	9.22.2022 Deposition of Dean Felicetti - Exhibit 7 - Engagement Agreement, MI AZ, December 6, 2020	Deposition Exhibit
669	9.22.2022 Deposition of Dean Felicetti - Exhibit 8 - January 8, 2021 Maggio email chain invoice	Deposition Exhibit
670	9.22.2022 Deposition of Dean Felicetti - Exhibit 9 - Phone text message, 8.12.2022	Deposition Exhibit
671	9.22.2022 Deposition of Dean Felicetti - Exhibit 10 - Coffee County Board of Educations and Registration Elections	Deposition Exhibit



Exhibit No.	Document Description	Document Type
	Office Security Video, 1.7.2021	
672	9.22.2022 Deposition of Dean Felicetti - Exhibit 11 - January 8, 2021 From 5pm to 6pm missing video	Deposition Exhibit
673	9.22.2022 Deposition of Dean Felicetti - Exhibit 12 - Bates Numbers 08122022 to 265	Deposition Exhibit
674	9.22.2022 Deposition of Dean Felicetti - Exhibit 13 - Password Memos, 08122022 - 000123 through 125	Deposition Exhibit
675	9.22.2022 Deposition of Dean Felicetti - Exhibit 14 - Maggio hard drive contents (screenshots)	Deposition Exhibit
676	9.22.2022 Deposition of Dean Felicetti - Exhibit 15 - 8.17.2022 Maggio Production (Triage reports) Folder Structure	Deposition Exhibit
677	9.22.2022 Deposition of Dean Felicetti - Exhibit 16 - Bates No.s 08122022-000126 through 136	Deposition Exhibit
678	9.22.2022 Deposition of Dean Felicetti - Exhibit 17 - Bates No.s 08122022-000137 through 161	Deposition Exhibit
679	9.22.2022 Deposition of Dean Felicetti - Exhibit 18 - Bates No.s 08122022-000175 through 176	Deposition Exhibit
680	9.22.2022 Deposition of Dean Felicetti - Exhibit 19 - Bates	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	No.s 08122022-000098 through 105	
681	9.22.2022 Deposition of Dean Felicetti - Exhibit 20 - Bates No.s 08122022-000204 through 205	Deposition Exhibit
682	9.22.2022 Deposition of Dean Felicetti - Exhibit 21 - Bates No.s 08122022-000205.XLSX	Deposition Exhibit
683	9.22.2022 Deposition of Dean Felicetti - Exhibit 22 - Bates No.s 08122022-000022 through 33	Deposition Exhibit
684	9.22.2022 Deposition of Dean Felicetti - Exhibit 23 - Maggio-000057 58 Excel	Deposition Exhibit
685	9.22.2022 Deposition of Dean Felicetti - Exhibit 24 May 7, 2021 Barnes e-mail chain re: Cyber Ninjas	Deposition Exhibit
686	9.22.2022 Deposition of Dean Felicetti - Exhibit 25 - Subpoena	Deposition Exhibit
687	9.22.2022 Deposition of Dean Felicetti - Exhibit 26 State Defendants-001 01937	Deposition Exhibit
688	9.22.2022 Deposition of Dean Felicetti - Exhibit 27 - ICS Advisory (ICSA-22-154-01) Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit
689	9.22.2022 Deposition of Dean Felicetti - Exhibit 28 Copy of Check to Defendant the Republic	Deposition Exhibit
690	2022.11.22 Deposition of Alex Cruce - Exhibit 1 - Subpoena	

Exhibit No.	Document Description	Document Type
691	2022.11.22 Deposition of Alex Cruce - Exhibit 2 - Email with Slogs from Misty Hampton, dated January 7, 2021	
692	2022.11.22 Deposition of Alex Cruce - Exhibit 3 - Color photographs	
693	2022.11.22 Deposition of Alex Cruce - Exhibit 4 - Binnall Maggio Engagement Letter	
694	2022.11.22 Deposition of Alex Cruce - Exhibit 5 - Washington Post Inquiry	
695	2022.11.22 Deposition of Alex Cruce - Exhibit 6 - Recording Transcript	
696	2022.11.22 Deposition of Alex Cruce - Exhibit 7 - OCR Additional Documents	
697	2022.01.19 Deposition of Donna Curling - Exhibit 1 - Amended Notice of Deposition	
698	2022.01.19 Deposition of Donna Curling - Exhibit 3 - Declaration of Donna Curling in Support of Curling Plaintiffs' Motion for Preliminary Injunction	
699	2022.01.19 Deposition of Donna Curling - Exhibit 7 - Verified Complaint for Declaratory Relief, Injunctive Relief, and Writ of Mandamus	
700	2022.01.19 Deposition of Donna Curling - Exhibit 8 - Third Amended Complaint	
701	2022.01.19 Deposition of Donna Curling - Exhibit 9 -	

Exhibit No.	Document Description	Document Type
	Email Chain (CURLING-0006817 - 0006818)	
702	2022.01.19 Deposition of Donna Curling - Exhibit 10 - Email Chain (CURLING-0010237 - 0010239)	
703	2022.01.19 Deposition of Donna Curling - Exhibit 11 - Email chain (CURLING-0010015 - 0010023)	
704	2022.01.19 Deposition of Donna Curling - Exhibit 12 - Email chain (CURLING-0010166 - 0010180)	
705	2022.01.19 Deposition of Donna Curling - Exhibit 14 - Curling Plaintiffs' Responses and Objections to Ahn Le's First Interrogatories to Donna Curling, Donna Price, and Jeffrey Schoenberg	
706	2022.01.19 Deposition of Donna Curling - Exhibit 15 - Curling Plaintiffs' Responses to Defendant Brad Raffensperger's First Requests For Admission	
707	2022.01.19 Deposition of Donna Curling - Exhibit 16 - Declaration of Donna P. Curling in Support of Motion for Preliminary Injunction	
708	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 1 - Linked In Profile of Ben Cotton	

Exhibit No.	Document Description	Document Type
709	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 2 - Letter from Andrew Parker to Mary Kaiser, and others, dated 8.24.2022	
710	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 3 - Letter from Andrew Parker to Mary Kaiser dated 8.19.2022	
711	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 4 - Article entitled: Pro-Trump Tech Team Copied Georgia Election Data, Records Show	
712	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 5 - 1.8.2021 Paul Maggio email chain and invoice	
713	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 6 - Key Photos from Maggio Production	
714	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 7 - 8.12.2022 Maggio Hard Drive Contents	
715	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 8 - 8.12.2022 Email addresses with access to CC data	
716	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 9 - 4.22.2021 Email, Greg Freemyer - no involvement	

Exhibit No.	Document Description	Document Type
717	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 10 - Email chain, Coffee County Forensics FedEx to Lambert	
718	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 11 - Cotton Excerpt, 7.21.2022 Motion Hearing, Lake v. Hobbs	
719	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 12 - Declaration of Benjamin R. Cotton in Lake v. Hobbs	
720	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 13 - 5.7.2021 Barnes email chain re: Cyber Ninjas	
721	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 14 - Georgia, Secretatary of State, News and Announcements, 1.27.2022	
722	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 15 - ICS Advisory (ICSA-22-154-01) 6.4.22, 3:21 p.m.	
723	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 16 - 7.13.2021 Corrected Exhibit B - 7.12 Declaration of J. Alex Halderman	
724	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit D1 - Exhibit D to Cotton First Declaration - EAC Inv Report Williamson County, TN	

Exhibit No.	Document Description	Document Type
725	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit D2 - Exhibit F to Cotton's First Declaration - Halderman Dec. 2020.08.19	
726	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit D3 - Exhibit G to Cotton First Declaration - Halderman Rebuttal Declaration	
727	State Defendants' Statement of Undisputed Material Facts Exhibit 1 - AJC Article: High-Tech Voting Due November	State Defendants' Statement of Undisputed Material Facts
728	State Defendants' Statement of Undisputed Material Facts Exhibit 2 - The National Academies Press: Securing the Vote Protecting American Democracy	State Defendants' Statement of Undisputed Material Facts
729	State Defendants' Statement of Undisputed Material Facts Exhibit 3 - Declaration of Ryan Germany	State Defendants' Statement of Undisputed Material Facts
730	State Defendants' Statement of Undisputed Material Facts Exhibit 4 - Declaration of Dr. Eric Coomer	State Defendants' Statement of Undisputed Material Facts
731	State Defendants' Statement of Undisputed Material Facts Exhibit 5 - Declaration of Dr. Juan Gilbert	State Defendants' Statement of Undisputed Material Facts
732	State Defendants' Statement of Undisputed Material Facts Exhibit 6 - SOS DRE De-certification Order	State Defendants' Statement of Undisputed Material Facts
733	State Defendants' Statement of Undisputed Material Facts	State Defendants' Statement of Undisputed Material Facts

Exhibit No.	Document Description	Document Type
	Exhibit 7 - Coalition Pltfs Motion to Sever	
734	State Defendants' Statement of Undisputed Material Facts Exhibit 8 - Coalition Pltfs Motion to Sever Brief ISO	State Defendants' Statement of Unidsputed Material Facts
735	State Defendants' Statement of Undisputed Material Facts Exhibit 9 - Curling Pltfs Notice of Joinder in Coalition's Motion to Sever	State Defendants' Statement of Unidsputed Material Facts
736	State Defendants' Statement of Undisputed Material Facts Exhibit 10 - Curling Pltfs Reply in Support of Motion to Sever	State Defendants' Statement of Unidsputed Material Facts
737	State Defendants' Statement of Undisputed Material Facts Exhibit 11 - Hearing Transcript for 11/19/21	State Defendants' Statement of Unidsputed Material Facts
738	State Defendants' Statement of Undisputed Material Facts Exhibit 12 - Declaration of Mark Riccobono	State Defendants' Statement of Unidsputed Material Facts
739	State Defendants' Statement of Undisputed Material Facts Exhibit 13 - Deposition Transcript of Teresa Lynn Ledford	State Defendants' Statement of Unidsputed Material Facts
740	State Defendants' Statement of Undisputed Material Facts Exhibit 14 - Hearing Transcript for 7/26/19	State Defendants' Statement of Unidsputed Material Facts
741	State Defendants' Statement of Undisputed Material Facts Exhibit 15 - Declaration of Chris Harvey	State Defendants' Statement of Unidsputed Material Facts



Exhibit No.	Document Description	Document Type
742	State Defendants' Statement of Undisputed Material Facts Exhibit 16 - Deposition Transcript of Donna Curling (1/19/22)	State Defendants' Statement of Undisputed Material Facts
743	State Defendants' Statement of Undisputed Material Facts Exhibit 17 - Curling Amended Complaint	State Defendants' Statement of Undisputed Material Facts
744	State Defendants' Statement of Undisputed Material Facts Exhibit 18 - Donna Curling ENET Report	State Defendants' Statement of Undisputed Material Facts
745	State Defendants' Statement of Undisputed Material Facts Exhibit 19 - Donna Curling email from 10/20/20	State Defendants' Statement of Undisputed Material Facts
746	State Defendants' Statement of Undisputed Material Facts Exhibit 20 - Deposition Transcript of Donna Price (3/8/22)	State Defendants' Statement of Undisputed Material Facts
747	State Defendants' Statement of Undisputed Material Facts Exhibit 21 - Donna Price ENET Report	State Defendants' Statement of Undisputed Material Facts
748	State Defendants' Statement of Undisputed Material Facts Exhibit 22 - Deposition Transcript of Jeffrey Schoenberg (10/19/21)	State Defendants' Statement of Undisputed Material Facts
749	State Defendants' Statement of Undisputed Material Facts Exhibit 23 - Jeffrey Schoenberg ENET Report	State Defendants' Statement of Undisputed Material Facts
750	State Defendants' Statement of Undisputed Material Facts Exhibit 24 - Jeffrey	State Defendants' Statement of Undisputed Material Facts

Exhibit No.	Document Description	Document Type
	Schoenberg Absentee ENET Report	
751	State Defendants' Statement of Undisputed Material Facts Exhibit 25 - CGG 30(b)(6) Deposition Transcript	State Defendants' Statement of Undisputed Material Facts
752	State Defendants' Statement of Undisputed Material Facts Exhibit 26 - Coalition Third Amended Complaint	State Defendants' Statement of Undisputed Material Facts
753	State Defendants' Statement of Undisputed Material Facts Exhibit 27 - Coalition Brief in Support of Motion for PI	State Defendants' Statement of Undisputed Material Facts
754	State Defendants' Statement of Undisputed Material Facts Exhibit 28 - Deposition Transcript of Laura Digges	State Defendants' Statement of Undisputed Material Facts
755	State Defendants' Statement of Undisputed Material Facts Exhibit 29 - Laura Digges ENET Report	State Defendants' Statement of Undisputed Material Facts
756	State Defendants' Statement of Undisputed Material Facts Exhibit 30 - Deposition Transcript of William Digges III	State Defendants' Statement of Undisputed Material Facts
757	State Defendants' Statement of Undisputed Material Facts Exhibit 31 - Coalition Pltfs Statement on William Digges	State Defendants' Statement of Undisputed Material Facts
758	State Defendants' Statement of Undisputed Material Facts Exhibit 32 - William Digges III ENET Report	State Defendants' Statement of Undisputed Material Facts

Exhibit No.	Document Description	Document Type
759	State Defendants' Statement of Undisputed Material Facts Exhibit 33 - Deposition Transcript of Ricardo Davis	State Defendants' Statement of Undisputed Material Facts
760	State Defendants' Statement of Undisputed Material Facts Exhibit 34 - Ricardo Davis ENET Report	State Defendants' Statement of Undisputed Material Facts
761	State Defendants' Statement of Undisputed Material Facts Exhibit 35 - Deposition Transcript of Megan Missett	State Defendants' Statement of Undisputed Material Facts
762	State Defendants' Statement of Undisputed Material Facts Exhibit 36 - Megan Missett ENET Report	State Defendants' Statement of Undisputed Material Facts
763	State Defendants' Statement of Undisputed Material Facts Exhibit 37 - The Georgia Risk-Limiting Audit/Hand Tally: A Carter Center Observation Report	State Defendants' Statement of Undisputed Material Facts
764	State Defendants' Statement of Undisputed Material Facts Exhibit 38 - The Carter Center Preliminary Statement on Georgia's November 2022 Risk-Limiting Audit Process	State Defendants' Statement of Undisputed Material Facts
765	State Defendants' Statement of Undisputed Material Facts Exhibit 39 - SOS Risk-Limiting Audit Report	State Defendants' Statement of Undisputed Material Facts
766	State Defendants' Statement of Undisputed Material Facts Exhibit 40 - Curling Plaintiffs' Responses to Defendant Brad Raffensperge's First RFA	State Defendants' Statement of Undisputed Material Facts

Exhibit No.	Document Description	Document Type
767	State Defendants' Statement of Undisputed Material Facts Exhibit 41 - MITRE Report	State Defendants' Statement of Undisputed Material Facts
768	State Defendants' Statement of Undisputed Material Facts Exhibit 42 - Declaration of Phillip Stark (3/9/22)	State Defendants' Statement of Undisputed Material Facts
769	State Defendants' Statement of Undisputed Material Facts Exhibit 43 - Phillip Stark Resignation Letter	State Defendants' Statement of Undisputed Material Facts
770	State Defendants' Statement of Undisputed Material Facts Exhibit 44 - Declaration of Phillip Stark (12/5/22)	State Defendants' Statement of Undisputed Material Facts
771	State Defendants' Statement of Undisputed Material Facts Exhibit 45 - Deposition Transcript of Dr. Phillip Stark	State Defendants' Statement of Undisputed Material Facts
772	State Defendants' Statement of Undisputed Material Facts Exhibit 46 - CURLING-0010015-0010023	State Defendants' Statement of Undisputed Material Facts
773	State Defendants' Statement of Undisputed Material Facts Exhibit 47 - CURLING-0010127-0010135	State Defendants' Statement of Undisputed Material Facts
774	State Defendants' Statement of Undisputed Material Facts Exhibit 48 - CURLING-0010142-0010152	State Defendants' Statement of Undisputed Material Facts
775	State Defendants' Statement of Undisputed Material Facts Exhibit 49 - CURLING-0010153-0010165	State Defendants' Statement of Undisputed Material Facts
776	State Defendants' Statement of Undisputed Material Facts	State Defendants' Statement of Undisputed Material Facts

Exhibit No.	Document Description	Document Type
	Exhibit 50 - CURLING-0010166-0010180	
777	State Defendants' Statement of Undisputed Material Facts Exhibit 51 - CURLING-0010181-0010184	State Defendants' Statement of Undisputed Material Facts
778	State Defendants' Statement of Undisputed Material Facts Exhibit 52 - Auditing Indian Elections Article	State Defendants' Statement of Undisputed Material Facts
779	State Defendants' Statement of Undisputed Material Facts Exhibit 53 - PI Hearing Transcript (9/10/20)	State Defendants' Statement of Undisputed Material Facts
780	State Defendants' Statement of Undisputed Material Facts Exhibit 54 - Securing the Vote: Protecting American Democracy	State Defendants' Statement of Undisputed Material Facts
781	State Defendants' Statement of Undisputed Material Facts Exhibit 55 - Third Supplemental Declaration of Philip Stark	State Defendants' Statement of Undisputed Material Facts
782	State Defendants' Statement of Undisputed Material Facts Exhibit 56 - Deposition Transcript of Kevin Skoglund	State Defendants' Statement of Undisputed Material Facts
783	State Defendants' Statement of Undisputed Material Facts Exhibit 57 - Deposition Transcript of Dr. Halderman (11/17/21)	State Defendants' Statement of Undisputed Material Facts
784	State Defendants' Statement of Undisputed Material Facts Exhibit 58 - Deposition Transcript of Dr. Halderman (1/3/23)	State Defendants' Statement of Undisputed Material Facts

Exhibit No.	Document Description	Document Type
785	State Defendants' Statement of Undisputed Material Facts Exhibit 59 - Expert Report of Dr. Andrew Appel	State Defendants' Statement of Undisputed Material Facts
786	State Defendants' Statement of Undisputed Material Facts Exhibit 60 - Deposition Transcript of Dr. Andrew Appel	State Defendants' Statement of Undisputed Material Facts
787	Declaration of J. Alex Halderman In Support of Motion for Preliminary Injunction (Aug. 8, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 1
788	Declaration of Richard A. DeMillo (Sept. 9, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 3
789	Declaration of J. Alex Halderman (Sept. 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 4
790	Transcript of Michael Ian Shamos, Ph.D., J.D. depo (July 19, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 5
791	Black Box Voting - Diebold TSx Evaluation, Security Alert (May 11, 2006)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 6
792	Declaration of Duncan A. Buell (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 7
793	Paper: Security Analysis of the Diebold AccuVote-TS Voting Machine (Sept. 13, 2006)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 8
794	Meeting Minutes on Electronic Voting System Security - House of Representatives Committee	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 9

Exhibit No.	Document Description	Document Type
	on House Administration (July 7, 2004)	
795	Transcript of Michael Barnes depo (June 27, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 10
796	Declaration of Michael Barnes (July 10, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 11
797	Powerpoint from Kennesaw State University Center for Election Systems on The Georgia Voting System (Feb. 2014)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 12
798	Order - Denying Plfs' Motions for Preliminary Injunction (Sept. 17, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 13
799	Declaration of Logan Lamb (Aug. 3, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 14
800	Affidavit of Logan Lamb (June 30, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 15
801	News Article from Kennesaw State University regarding the Center for Election Systems (Mar. 21, 2017)  Emails with KSU individuals	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 16
802	Email chain between Merle Steven King and Michael Barnes RE: Re: Follow Up from earlier email regarding security of	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 17



Exhibit No.	Document Description	Document Type
	elections.kennesaw.edu (Aug. 29, 2016)	
803	Supplemental Declaration of Logan Lamb (Jan. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 18
804	Email chain between Michael Barnes and Stephen Craig Gay RE: Request for data retrieval (Mar. 17, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 19
805	Email confirmation of delivery to State Election Board, sent from Scott Holcomb to Curling Plfs (July 6, 2016)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 20
806	Email chain between Christopher Dehner and Davide Gaetano RE: CES Network Assessment Meeting Notes 6/26 (July 19, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 21
807	Email chain between Christopher Dehner and Stephen Gay Re: CES server surplus (Aug. 9, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 23
808	News Article from AP News re: Georgia election server wiped after suit filed (Oct. 26, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 25
809	TRANSCRIPT OF EVIDENTIARY HEARING PROCEEDINGS (Sept. 12, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 26



Exhibit No.	Document Description	Document Type
810	DECLARATION OF J. ALEX HALDERMAN IN SUPPORT OF CURLING PLAINTIFFS' RESPONSE TO STATE DEFENDANTS' REQUEST FOR STATUS CONFERENCE AND NOTICE OF DECERTIFICATION OF GEMS/DRE SYSTEM AND CURLING PLAINTIFFS' REQUEST FOR HEARING (Jan. 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 27
811	Instructions on Creating and Saving Export File in GEMS - Transferring Files from FireZilla for Election Day by Kennesaw State University Center for Election Systems	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 28
812	TRANSCRIPT OF EVIDENTIARY HEARING PROCEEDINGS (July 25, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 29
813	Transcript of James Oliver depo (Jan. 17, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 30
814	Transcript of Sanford Merritt Beaver as Secretary of State 30(b)(6) and in personal capacity depo (Feb. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 31
815	Declaration of Chris Harvey (Aug. 25, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 35
816	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 36

Exhibit No.	Document Description	Document Type
817	Cloudburst Security - Office of the Georgia Secretary of State FINAL Vendor Cyber Risk Assessment (Feb. 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 37
818	Cloudburst Security - Office of the Georgia Secretary of State Cyber Risk Assessment (Oct. 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 38
819	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia DRAFT (Aug. 25, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 39
820	Email chain between Josh Hood and Ted Koval RE: Fannin County IP (April 3, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 40
821	Email chain between Dave Hamilton and Kimberly Lemley Re: [External]: Fwd: Potential leakage of voter data (Aug. 13, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 41
822	Email chain between Dave Hamilton and Merritt Beaver Re: The 590 Rule Attestation (Dec. 21, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 42
823	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION PROCEEDINGS (July 26, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 44
824	Declaration of Eric. D. Coomer (Nov. 13, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 45
825	STATE DEFENDANTS' RESPONSE TO COURT'S QUESTIONS ON NEW ELECTION SYSTEM	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 46

Exhibit No.	Document Description	Document Type
	VENDOR CONTRACT (July 30, 2019)	
826	Transcript of Gabriel Sterling depo (Feb. 24, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 48
827	Secretary of State 2020 Security of the Voter Registration System Artifacts and Attestation Pursuant to Rule 590-8-3-.01 (Dec. 18, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 49
828	Order - State Defendants' Motion to Dismiss Curling Plaintiffs' Third Amended Complaint and Coalition Plaintiffs' First Supplemental Complaint (July 20, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 51

Exhibit No.	Document Description	Document Type
829	<p>Bulletin State Election Board RE: GEMS Servers and Security (Sept. 12, 2016)</p> <p>Bulletin State Election Board RE: Suspected Russian Operative Activity (July 26, 2018)</p> <p>Bulletin State Election Board RE: Two Factor Authentication Security for ENET (July 30, 2018)</p> <p>Bulletin State Election Board RE: Physical Security Assessments Offered by Dept. of Homeland Security (Aug. 9, 2018)</p> <p>Bulletin State Election Board RE: Phishing Attempt (Aug 17, 2018)</p> <p>U.S. Dept. of Homeland Security Note re: U//FOUO Cybersecurity - Elections, Unattributed Network Activity - Unattributed Cyber Actors Attempt to Gain Acces to City Government Network Prior to Primary Election Voting (Oct. 3, 2018)</p> <p>U.S. Dept. of Homeland Security Note re: U//FOUO Cybersecurity - Elections, Unattributed Network Acticity - Unattributed Actors</p>	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 52

Exhibit No.	Document Description	Document Type
	<p>Spoof Senior State Election Official's Email, Spear Phish City Clerk (Oct. 4, 2018)</p> <p>Memo re: Election Security Information Needs: Foreign Threats to U.S. Elections (Sept. 5, 2018)</p> <p>U.S. Dept. of Homeland Security Note re: (U) A Georgia Perspective on Threats to the 2018 U.S. Elections (Oct. 2, 2018)</p>	
830	<p>Email chain between Chris Harvey and Ryan Germany RE: FW: 2020 Rule 590-8-3 Attestation and Assessment v 3.2 (Dec. 30, 2020) attachment Voter Registraton Certificate.pdf</p>	<p>Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 53</p>
831	<p>Declaration of J. Alex Halderman (Aug. 19, 2020)</p>	<p>Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 54</p>

Exhibit No.	Document Description	Document Type
832	Transcript of J. Alex Halderman depo (Nov. 17, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 55
833	Transcript of Andrew W. Appel depo (Jan. 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 56
834	Declaration of J. Alex Halderman (Oct. 2, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 57
835	Email chain between Cathi Smothers and Election Center RE: Muscogee Help Please RE: [EXTERNAL] RE: Database Corrections (April 2, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 58
836	Declaration of Elizabeth Throop (Mar. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 59
837	Email chain between Chris Harvey and Blake Evans (Nov. 13, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 60
838	Email chain between Nick Salsman and Dave Hamiltore RE:	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 61
839	Election Office Notes: 10am 6/15/20 Meeting - Basic Overview most data provided by Michael Barnes. Nick and Terrence in attendance.	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 62
840	Transcript of Derrick Gilstrap Fulton County Board of Registration and Elections 30(b)(6) depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 63

Exhibit No.	Document Description	Document Type
841	Email chain between Michael Barnes and Scott Tucker RE: L&A Export to State (Jan. 15, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 64
842	Email chain between Kevin Rayburn and Veronica Johnson RE: ENR L&A Test Upload (June 2, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 65
843	Email chain between Chris Futrick and Paul Brandau RE: ElectionNet code / credentials posted publicly (Oct. 17, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 66
844	Transcript of James A. Barnes Jr. depo (July 20, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 67
845	Email chain between Dave Hamilton and Michael Smith RE: DataLocker Follow Up (July 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 68
846	Transcript of David Hamilton depo (Jan. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 69
847	Transcript of Richard Barron depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 70
848	Transcript of Juan Gilbert Ph.D. depo (Oct. 29, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 71
849	Screenshot of Youtube video: DouglasNow.com, Dominion Voting Machine Flaws – 2020 Election Coffee County, Georgia Video 1, YouTube (Dec. 9, 2020),	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 72

Exhibit No.	Document Description	Document Type
	<a href="https://www.youtube.com/watch?v=46CAKyyObls&amp;t=16s">https://www.youtube.com/watch?v=46CAKyyObls&amp;t=16s</a>	
850	Photo of computer serial number and note: SOS_Georgia and Votes!	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 73
851	Photo of note on computer	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 74
852	Declaration of J. Alex Halderman (Nov. 22, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 75
853	Secretary of State Investigation report RE: Coffee County - Miscellaneous - SEB2020-250 (Sept. 28, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 76
854	Transcript of interview of Brad Raffensperger re: U.S. House of Representatives Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Nov. 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 77
855	Rev.com article "Georgia Secretary of State Brad Raffensperger Press Conference Transcript: Announces Hand Recount" (Nov. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 78



Exhibit No.	Document Description	Document Type
856	Secure, Accessible & Fair Elections (SAFE) Commission Report - Submitted to the General Assembly (Jan. 10, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 79
857	Joint Discovery Statement Regarding Production of FBI Server Image (Aug. 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 80
858		
859	Secretary of State press release "Security-Focused Tech Company, Dominion Voting to Implement new Verified Paper Ballot System" (July 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 82
860	STATE DEFENDANTS' SUPPLEMENTAL NOTICE REGARDING NEW ELECTION SYSTEM VENDOR CONTRACT (Aug. 9, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 83
861	Master Solution Purchase and Services Agreement between Dominion Voting Systems and Secretary of State of the State of Georgia (July 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 84
862	Transcript of Chris Harvey as Secretary of State 30(b)(6) (Jan. 28, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 85
863	Screenshot of Tweet from Gabriel Sterling with responses from David Cross and Marilyn Marks (Oct. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 86
864	TRANSCRIPT OF HEARING ON PRELIMINARY	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 87

Exhibit No.	Document Description	Document Type
	INJUNCTION (Sept. 10, 2020)	
865	Declaration of J. Alex Halderman (Aug. 2, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 88
866	Declaration (Eighth) of Philip B. Stark (Aug. 2, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 89
867	Declaration (Second Supplemental) of Philip B. Stark (Oct. 22, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 90
868	Paper "Addendum to Basic Security Requirements for Voting Systems" by Wenke Lee, Ph.D. (Jan. 3, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 92
869	REBUTTAL REPORT OF ANDREW W. APPEL (July 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 93
870	"What Voters are Asked to Verify Affects Ballot Verification: A Quantitative Analysis of Voters' Memories of their Ballots" - By Richard A. DeMillo and Robert S. Kadel (Georgia Institute of Technology) and Marilyn R. Marks (Coalition for Good Governance) (Nov. 23, 2018) (Revised April 11, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 94
871	Georgia Voter Verification Study by The University of Georgia Political Science School of Public and International Affairs (Jan. 22, 2021) draft version	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 95

Exhibit No.	Document Description	Document Type
872	Letter from professors to Secretary Crittenden, Secretary Raffensperger, and SAFE Commission Members (Jan. 7, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 96
873	Declaration of J. Alex Halderman (Dec. 16, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 97
874	Email chain between Marilyn Marks and Richard Barron RE: More on Athens (June 12, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 98
875	COALITION PLAINTIFFS' EXPERT DISCLOSURES – OPENING REPORTS (July 1, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 99
876	Screenshot of Tweet thread from Ben Adida (Oct. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 100
877	Screenshot of Tweet thread from Jeanne Dufort and Ben Adida (Feb. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 101
878	Screenshot of Verified Voting map of Election Day Equipment - November 2022	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 102
879	Declaration of Warren Stewart (Dec. 16, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 103
880	Written Testimony of Verified Voting.org - Marian K. Schneider, President (June 5, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 104

Exhibit No.	Document Description	Document Type
881	Transcript of Michael Barnes depo (Feb. 11, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 105
882	Email chain between Chris Harvey and Ryan Germany RE: Election Certification (June 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 106
883	Email chain between Blake Evans and Andrew Jackson RE: 3 images (Mar. 1, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 107
884	Letter from Governor Brian Kemp to the State Election Board members (Nov. 17, 2021)  Memo "Review of Inconsistencies in the Data Supporting the Risk Limiting Audit Report" (Nov. 17, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 108
885	Email chain between Kay Stimson and Jen Daulby RE: Voting issue in Georgia (Nov. 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 109
886	US Patent - Transparent Interactive Printing Interface (June 15, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 110
887	Email chain between Chris Harvey and Frances Watson RE: FULTON COUNTY - MACHINES DOWN AND POLLING PLACES NOT OPEN (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 111

Exhibit No.	Document Description	Document Type
888	Email chain between Julie Houk and Ryan Germany RE: Election Protection hotline receiving reports of voting machine/poll pad issues in Floyd, Chatham, Fulton and Gwinnett Counties (Aug. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 112
889	Email chain between Ryan Germany and Frances Watson and Chris Harvey RE: Polling Machine Issues (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 113
890	Email chain between Chris Harvey and Richard Barron and Joseph Evans RE: Complaint - Down Machines (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 114
891	Email chain between Chris Harvey and Gabriel Sterling, Frances Watson, and Tom Feehan RE: Cross Keys High School- Dekalb (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 115
892	Email chain between Kevin Rayburn and Scott Tucker, Ryan Germany, Tom Feehan, and Cathi Smothers RE: continuing ENR issues (June 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 116
893	Email chain between Chris Harvey and Joseph Evans RE: South Atlanta High School Polling Location machines not working (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 117
894	Email chain between Gabriel Sterling and Tom Feehan, Chris Harvey RE: voter- 6	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 118

Exhibit No.	Document Description	Document Type
	hour wait and not voted yet (June 9, 2020)	
895	Email chain between Chris Harvey and Erica Hamilton RE: MACHINES NOT WORKING, NO PAPER BALLOTS AVAIL (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 119
896	Email chain between Leigh Combs and Chris Harvey RE: Turning people away (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 120
897	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 121
898	STATE DEFENDANTS' OBJECTIONS AND RESPONSES TO CURLING PLAINTIFFS' FIRST SET OF INTERROGATORIES (July 15, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 122
899	STATE DEFENDANTS' RESPONSES AND OBJECTIONS TO CURLING PLAINTIFFS' SECOND SET OF INTERROGATORIES (Aug. 23, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 123
900	TRANSCRIPT OF TELEPHONE CONFERENCE PROCEEDINGS (Oct. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 125
901	Response to Revised Interrogatories 15, 16, 19, 20, 21, 25, 26	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 126

Exhibit No.	Document Description	Document Type
902	Email chain between Frances Watson and Pamela Jones RE: Fwd: Coffee County (May 11, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 127
903	Transcript of Anh Le depo (Nov. 4, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 128
904	Transcript of Mathew Mashburn depo (Nov. 4, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 129
905	Transcript of Rebecca Nash Sullivan, Esq. depo (Nov. 5, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 130
906	Declaration of J. Alex Halderman (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 131
907	Photos of Video of pollpads, scanning, receipt	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 133
908	Photo of Acceptance Sheet of General Election Ballot (July 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 134
909	Photo of pollpad receipt re: Sunday Liquor Sales total votes	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 135
910	Dominion "2.02 Democracy Suite System Overview" (Nov. 26, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 136



Exhibit No.	Document Description	Document Type
911	Transcript of APC Raffensperger 21022, Speakers Brad Raffensperger, Mark Niesse, and Nicole Carr (Feb. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 137
912	Transcript of Sanford Merritt Beaver as Secretary of State 30(b)(6) depo (Mar. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 138
913	Secretary of State press release "Secretary Raffensperger Calls on J. Alex Halderman to Agree to Release "Secret Report" and Pre-Election Testimony" (Jan. 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 139
914	Transcript of Janice W. Johnston M.D. (Aug. 23, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 140
915	Transcript of Sara Tindall Ghazal (Nov. 5, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 141
916	Transcript of Edward H. Lindsey Jr. (Aug. 31, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 142
917	Statement of Interest RE: Vulnerability Disclosure Issues in Curling v. Raffensperger, No. 17-cv-2989 (N.D. Ga.) from Brandon Wales CISA to Brian Boynton Acting Assistant Attorney General (Jan. 20, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 143



Exhibit No.	Document Description	Document Type
918	Notice from CISA "in response to matters raised at the Court's February 2, 2022 hearing regarding CISA's Coordinated Vulnerability Disclosure (CVD) process." (Feb. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 144
919	Status Report from CISA "on the final steps of CISA's Coordinated Vulnerability Disclosure process." (May 19, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 145
920	CISA ICS Advisory (ICSA-22-154-01) - Vulnerabilities Affecting Dominion Voting Systems ImageCast X (June 3, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 146
921	Status Report from CISA "to update the Court and the parties on CISA's ongoing Coordinated Vulnerability Disclosure (CVD) process." (Mar. 14, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 147
922	Status Report from CISA "to update the Court and the parties on CISA's ongoing Coordinated Vulnerability Disclosure (CVD) process." (Apr. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 148
923	Transcript of Gabriel Sterling as Secretary of State 30(b)(6) depo (Oct. 12, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 149
924	Transcript of Wendell Stone as Coffee County Board of Elections & Registration 30(b)(6) depo (Sept. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 150

Exhibit No.	Document Description	Document Type
925	Transcript of Eric B. Chaney 30(b)(6) depo (Aug. 15, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 151
926	Paper "Basic Security Requirements for Voting Systems" by Wenke Lee, Ph.D. (Oct. 8, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 152
927	Declaration of J. Alex Halderman in Coomer v. Trump (Aug. 31, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 153
928	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia (Apr. 9, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 154
929	Fortalice Red Team Penetration Test and Cyber Risk Assessment, State of Georgia, Office of the Secretary of State - November 2018	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 155
930	Fortalice Solutions Web Vulneability Remediation Checks, Secretary of State Georgia DRAFT (July 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 156
931	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia DRAFT (May 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 157
932	Fortalice Solutions Firmware Comparison and Configuration Analysis, Secretary of State Georgia DRAFT (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 158

Exhibit No.	Document Description	Document Type
933	Email chain between Meghan Aubry and Adam Sparks RE: Curling, et al. v. Raffensperger, et. al subpoena - Fortalice initial production in response to subpoena (July 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 159
934	Email chain between Chris Harvey and Frances Watson RE: SOS complaint in Fulton (Nov. 6, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 160
935	Powerpoint re: Fulton County SEB2020-027 Election Day Issues	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 161
936	Email chain between Chris Harvey and Frances Watson RE: photographs taken in poll in Hart County (Nov. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 162
937	Email chain between Chris Harvey and Samantha Sheldon RE: Jefferson County Board of Elections (Feb. 26, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 163
938	Email chain between Michael Barnes and Clinch County Elections RE: Data Seals (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 164
939	SOS Request for Changes "RFC_Election Center Data Center" (Aug. 16, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 165
940	Transcript of Dominic Olomo depo (Sept. 4, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 166

Exhibit No.	Document Description	Document Type
941	Transcript of Dominic Olomo 30(b)(6) Fulton County Board of Registration and Elections depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 167
942	Email chain between Dwight Brower and Richard Barron, Derrick Gilstrap and Timothy Cummings RE: Concerns over handling of Early voting ballots (Nov. 20, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 168
943	Notice on the Continuation of the National Emergency With Respect to Foreign Interference In or Undermining Public Confidence in United States Elections (Sept. 7, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 169
944	Email chain between Merritt Beaver and Klint Walker RE: DHS (Nov. 12, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 170
945	Email chain between Kevin Rayburn and Jordan Fuchs RE: I bet I can hack your electronic voting machines. (Apr. 5, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 171
946	Screenshot of text message thread from Eric Chaney (March 2018 - March 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 172
947	Transcript of Misty Hampton depo (Nov. 11, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 173
948	Screenshot of text message thread to Eric and Cathy	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 174

Exhibit No.	Document Description	Document Type
949	Transcript of Dean M. Felicetti depo (Sept. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 175
950	Screenshots re: "Coffee County Board of Elections and Registration Elections Office Security Video January 7, 2021"	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 176
951	Screenshots re: "January 8, 2021 From 5pm to 6pm missing video"	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 177
952	Email chain between Paul Maggio and Sidney Powell RE: 55A1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement (Jan. 8, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 178
953	SEALED - Coffee County server activity spreadsheet	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 179
954	Transcript of Kevin Skoglund depo (Dec. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 181
955	Screenshots of Coffee County video footage of Jeffrey Lenberg (Jan. 27, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 182
956	Screenshots of Coffee County video footage of Doug Logan and Jeffrey Lenberg (Jan. 18 and 19, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 183
957	Transcript of Jeffrey Lenberg depo (Nov. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 184

Exhibit No.	Document Description	Document Type
958	"Coffee County ICC & ICP Reports"	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 185
959	Email chain between Misty Hampton and Tracie Vickers RE: Open Records Request (Feb. 4, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 186
960	Declaration of J. Alex Halderman (Jan. 7, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 187
961	Email chain between Bruce Brown and Defendants' Counsel RE: JSON Format Cast Vote Records on the Internet (July 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 188
962	Screenshot of Tweet from Juha Keskinen RE: "Dominion Voting Systems sues 'MyPillow Guy' for \$1.3 billion" (Feb. 26, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 189
963	Letter from Jil Ridlehoover to Board of Elections Chair re her resignation from Coffee County (Feb. 25, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 190
964	Letter from Misty Hampton to Board of Elections Chair re her resignation from Coffee County (Feb. 25, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 191
965	Screenshot of text message thread to Misty Hampton (Feb. 21, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 192
966	Transcript of Jil Ridlehoover depo (Aug. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 193



Exhibit No.	Document Description	Document Type
967	Fortalice Solutions Incident Response, Evidence Collection Process - Windows Operating Systems (Feb. 26, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 194
968	Secretary of State press release "Raffensperger to Replace Coffee County Election Equipment, End Distraction for Local Election Officials" (Sept. 23, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 195
969	Doc. 1377-4 - Hash Verification	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 197
970	Email chain between Bryan Tyson and all counsel RE: Secretary Raffensperger's Channel 11 Interview (Sept. 26, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 200
971	Declaration of James Persinger (Nov. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 201
972	Email chain between Bryan Tyson and Russ Abney and Caroline Middleton RE: Supplemental discovery obligations—Coffee County investigation files (Jan. 16, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 202
973	Letter from Steven Ellis Deputy General Counsel to GBI Director Vic Reynolds Re: Request for Assistance in Investigation (Aug. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 203
974	Email chain between Ryan Germany and Frances Watson and Chris Harvey RE:	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 205

Exhibit No.	Document Description	Document Type
	Polling Machine Issues (June 9, 2020)	
975	Email chain between Ryan Germany, Bryan Tyson, Carey Miller, and Vincent Russo RE: FW: GASOS ORR #22-360 from The Associated Press (Aug. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 206
976	Email chain between Sara Koth and Steven Ellis RE:FW: Open Records Request (July 12, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 207
977	Email chain between Steven Ellis and Anthony Rowell, Ryan Germany RE: Coffee County SEB investigation (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 208
978	Screenshots of Coffee County video footage (Dec. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 209
979	Screenshots of Coffee County video footage (Dec. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 210
980	Transcript of Robert A. Sinners depo (Sept. 28, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 211
981	Email chain between Harry MacDougald and Robert Sinners RE: Data File Needed for Vote Swapping/Switching (Nov. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 212



Exhibit No.	Document Description	Document Type
982	LABELED Exhibit 215 [doc no. 1635-42] Dominion Voting press release "Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System" (May 6, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 213
983	Photo of note on computer (same as exhibit 74)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 214
984	Email chain between Frances Watson and Pamela Jones RE: Fwd: Coffee County (May 11, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 215
985	Article from 11Alive "Questions raised in timeline of state response to Coffee County breach" (Sept. 26, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 216
986	Screenshot of video "The Carter Center, Restoring Confidence in American Elections Panel 3 -April 29, 2022, YouTube (May 9, 2022)" of Gabriel Sterling with quote "So we are still dealing with that here and we still have to prove negatives in all these cases. It's similar across the board. But like, we had claims... even recently there was people saying: 'We went to Coffee County. We imaged everything.' There's no evidence of any of that. It didn't happen."	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 217

Exhibit No.	Document Description	Document Type
987	Sharepoint Listing Investigations for Coffee County	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 218
988	Declaration (Seventh) Philip B. Stark (Sept. 13, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 219
989	Transcript of Philip Stark depo (Dec. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 220
990	Declaration Philip B. Stark (Jan. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 221
991	Declaration (Eighth) of Philip B. Stark (Aug. 2, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 222
992	Declaration of Andrew W. Appel In Support of Motion for Preliminary Injunction (Dec. 13, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 223
993	Declaration (Fifth) of Philip B. Stark (Aug. 23, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 224
994	Declaration Philip B. Stark (filed Sept. 11, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 225
995	Declaration of Donna A. Curling (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 226

Exhibit No.	Document Description	Document Type
996	Declaration of Donna A. Curling In Support of Brief Regarding Standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 227
997	Transcript of Donna Curling depo (Jan. 19, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 228
998	Secretary of State press release "Secretary Raffensperger Calls On Department Of Justice To Investigate Allegations Of Fulton County Shredding Applications" (Oct. 11, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 229
999	Transcript of Donna Price depo (Mar. 8, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 230
1000	Declaration of Donna Price in support of standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 231
1001	Declaration of Jeffrey H. E. Schoenberg In Support of Brief on Standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 232
1002	Transcript of Jeffrey Schoenberg depo (Oct. 19, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 233
1003	Declaration of Donna Price (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 234
1004	Declaration of Jeffrey Schoenberg (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 235

Exhibit No.	Document Description	Document Type
1005	Declaration of Jeffrey Schoenberg (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 236
1006	Screenshot of video "Universite de Geneve (UNIGE), How to safeguard democracy? A look back at the last American presidential election. Gabriel Sterling, YouTube (Oct. 4, 2021, uploaded Nov. 25, 2021)" with quote	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 237
1007	Declaration of Jeffrey Schoenberg (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 238
1008	Declaration of Amber F. Reynolds (Aug. 20, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 239
1009	Email chain between Alex Wan and Richard Barron and Marilyn Marks RE: Important report on Dominion system (Apr. 21, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 243
1010	Email chain between Marilyn Marks, Fulton Election Board and numerous individuals from the City of Atlanta, Sandy Springs, Johns Creek, Roswell, Alpharetta RE: Fulton Officials--Urgent Voting Protections Required--Needed Actions (June 6, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 244
1011	Email chain between Marilyn Marks and Richard Barron RE: FW: Correspondence to	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 245

Exhibit No.	Document Description	Document Type
	Fulton last month re scanner issue (July 8, 2020)	
1012	Email chain between Marilyn Marks and Fulton County Election Board RE: Urgent Issues for BRE Consideration-Voting System Problems (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 246
1013	Email chain between Felicia Strong-Whitaker and Janay Wilborn, Robb Pitts, and Richard Barron RE: Logic and Accuracy Test for August election (July 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 247
1014	Email chain between Timothy Cummings and Dwight Brower, Michael Barnes RE: Voter with Double QR Codes on Ballot (Oct. 22, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 248
1015	Transcript of Cathleen Latham depo (Aug. 8, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 249
1016	Screenshots of Coffee County video footage (Jan. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 250
1017	Screenshots of Coffee County video footage (Jan. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 251
1018	Screenshot of Tweet thread between Ben Adida and David Cross (Oct. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 252

Exhibit No.	Document Description	Document Type
1019	Transcript of Benjamin Cotton depo (Aug. 25, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 253
1020	Powerpoint re: Cybersecurity Considerations for Voting Systems by Wenke Lee	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 254
1021	Declaration of Kevin Skoglund (Dec. 5, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 255
1022	Declaration of Benjamin Cotton (June 8, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 256
1023	Transcript of Doug Logan depo (Nov. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 257
1024	Shipping confirmation "FW: Coffee County Forensics FEDEX Request" (Apr. 27, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 258
1025	Secretary of State Investigation report RE: Coffee County - Miscellaneous - SEB2020-250 (Sept. 28, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 259

Exhibit No.	Document Description	Document Type
1026	Screenshot of video "The Carter Center, Restoring Confidence in American Elections Panel 3 -April 29, 2022, YouTube (May 9, 2022)" of Gabriel Sterling with quote "So we are still dealing with that here and we still have to prove negatives in all these cases. It's similar across the board. But like, we had claims... even recently there was people saying: 'We went to Coffee County. We imaged everything.' There's no evidence of any of that. It didn't happen."	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 260
1027	Secretary of State press release "Georgia's 2022 Statewide Risk Limiting Audit Confirms Results" (Nov. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 261
1028	Transcript of Proceedings before the Honorable Judge John J. Tuchi - Motion Hearing in Kari Lake v. Katie Hobbs (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 262
1029	Photos of tags with flashdrives redacted	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 263
1030	Transcript of J. Alex Halderman depo (Jan. 3, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 264
1031	Transcript of Alex Andrew Cruce depo (Nov. 22, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 265



Exhibit No.	Document Description	Document Type
1032	Transcript of Blake Edward Voyles depo (Nov. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 266
1033	Photos of tags with flashdrives redacted	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 267
1034	Screenshot of text message thread from Eric Chaney (March 2018 - March 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 268
1035	Email chain between Paul Maggio and Sidney Powell RE: 55A1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement (Jan. 8, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 269
1036	Email chain between Steven Ellis and Anthony Rowell, Ryan Germany RE: Coffee County SEB investigation (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 271
1037	Transcript of telephone discovery conference (Apr. 7, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 272
1038	Declaration of Donna A. Curling (May 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 273
1039	Declaration of Donna Price (May 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 274
1040	Declaration of Jeffrey H. E. Schoenberg In Support of Motion for Preliminary Injunction (May 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 275



Exhibit No.	Document Description	Document Type
1041	Publication in Election Law Journal "Ballot-Marking Devices (BMDs) Cannot Assure the Will of the Voters" (Feb. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 287
1042	Fulton County Defendants' Response to Plaintiffs' Second Request for Admission (Aug. 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 290
1043	Email chain between Robert McGuire and Josh Belinfante, Bruce Brown, Cary Ichter, David Cross, Marilyn Marks, and Jill Connors RE: Coalition's request for missing discovery files (Mar. 25, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 291
1044	Declaration of Donna A. Curling (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 293
1045	Declaration (Supplemental) of Marilyn Marks (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 294
1046	Declaration of Donna A. Curling In Support of Plfs' Motion for Preliminary Injunction (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 297
1047	Declaration of Donna Price (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 298
1048	Declaration (Supplemental) of Kevin Skoglund (July 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 301

Exhibit No.	Document Description	Document Type
1049	Harrison Floyd Consolidated Opposition to Motions to Quash Subpoenas	Court Filing - <i>State of Georgia v. Harrison Floyd, et al.</i> , 23SC188947 (Fulton County Superior Court)
1050	Matthew Bernhard, Allison McDonald, Henry Meng, Jensen Hwa, Nakul Bajaj, Kevin Chang, and J. Alex Halderman. " <i>Can Voters Detect Malicious Manipulation of Ballot Marking Devices?</i> ," 2020 IEEE Symposium on Security and Privacy (SP), San Francisco, CA, USA, 2020, pp. 679-694, doi: 10.1109/SP40000.2020.00118. May 2020. <a href="https://doi.org/10.1109/SP40000.2020">https://doi.org/10.1109/SP40000.2020</a> .	<a href="https://ieeexplore.ieee.org/document/9152705">https://ieeexplore.ieee.org/document/9152705</a>
1051	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to BMD verifacaiton rates for ballots.	Tweet
1052	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to BMD verifacaiton rates for ballots and the lack of study of paper ballots.	Tweet
1053	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to verification rates.	Tweet
1054	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to the market for voting equipment.	Tweet
1055	2021.04.12 Screenshot of Tweet from Matt Bernhard	Tweet

Exhibit No.	Document Description	Document Type
	relating to Americans who don't like paper ballots.	
1056	2021.03.18 Screenshot of Tweet from Matt Bernhard relating to "cosmic rays" affecting voting machines.	Tweet
1057	2021.03.18 Screenshot of Tweet from Matt Bernhard relating to "cosmic rays" affecting voting machines, and providing source.	Tweet
1058	2020.10.26 Screenshot of Tweet from Matt Bernhard relating to "fearmongering advocates" helping suppress voter turnout.	Tweet
1059	2020.10.12 Screenshot of Tweet from Matt Bernhard responding to Michigan Engineering for avoiding voting if no paper trail.	Tweet
1060	2020.10.12 Screenshot of Tweet from Matt Bernhard stating that his study did not find that "almost 95% of votes don't review their printouts."	Tweet
1061	2020.10.12 Screenshot of Tweet from Matt Bernhard clarifying that "40% of our participants reviewed their ballots."	Tweet
1062	2020.11.21 Screenshot of Tweet from Alex Halderman stating that the risk-limiting audit in Georgia was positive. Gabriel Sterling replying.	Tweet

Exhibit No.	Document Description	Document Type
1063	2020.11.15 Screenshot of Tweet from Alex Halderman stating that "I've seen no credible evidence whatsoever that the 2020 presidential outcome was hacked."	Tweet
1064	2020.11.13 Screenshot of Tweet from Alex Halderman retweeting Frank Bajak regarding U.S. election security challenges.	Tweet
1065	2020.11.12 Screenshot of Tweet from Alex Halderman replying to a tweet of Donald Trump regarding Dominion not having deleted votes.	Tweet
1066	2020.11.24 Screenshot of Tweet from Alex Halderman replying to Julian Sanchez saying that "the strongest claim real election security experts can make is that hacking outcomes would be 'complicated' and there's no credible evidence it happened."	Tweet
1067	2020.11.15 Screenshot of Tweet from Alex Halderman replying to Tweet from Joseph Nierenberg.	Tweet
1068	2020.11.15 Screenshot of Tweet from Alex Halderman replying to Tweet from Joseph Nierenberg. Halderman stated that "If an attacker can falsely convince people the results are wrong, that's also a security failure."	Tweet

Exhibit No.	Document Description	Document Type
1069	2020.11.15 Screenshot of Tweet from Alex Halderman reponding to Tweet from Joseph Nierenberg regarding election security.	Tweet
1070	2020.11.11 Screenshot of Tweet from Alex Halderman regarding Georgia's previous voting machines.	Tweet
1071	2020.11.11 Screenshot of Tweet from Alex Halderman regarding voters voting by different methods.	Tweet
1072	2020.11.24 Screenshot of Tweet from Alex Halderman replying to John Moser regarding auditing ballots.	Tweet
1073	2020.11.24 Screenshot of Tweet from Alex Halderman replying to John Moser regarding forensic analysis.	Tweet
1074	2023.10.15 Screenshot of Tweet from Marilyn Marks regarding Sidney Powell motion and Fani Willis.	Tweet
1075	2021.07.10 Screenshot of Tweet from Marilyn Marks stating that BMDs are not safe to vote on.	Tweet
1076	2021.08.23 Screenshot of Tweet from Marilyn Marks responding to PeepleWatcher regarding explaining what a BMD ballot looks like.	Tweet
1077	2021.07.10 Screenshot of Tweet from Marilyn Marks telling people to ask their GA officials to read Andrew Appel's newest report.	Tweet

Exhibit No.	Document Description	Document Type
1078	2022.01.20 Screenshot of Tweet from Marilyn Marks stating that "there's no evidence that widespread fraud or hacking occurred."	Tweet
1079	2021.09.11 Screenshot of Tweet from Marilyn Marks regarding California voters.	Tweet
1080	2021.09.12 Screenshot of Tweet from Marilyn Marks regarding not being affiliated with the GOP.	Tweet
1081	2021.09.12 Screenshot of Tweet from Marilyn Marks regarding RLAs implementation.	Tweet
1082	2021.09.12 Screenshot of Tweet from Marilyn Marks regarding audit for California recall.	Tweet
1083	2021.09.12 Screenshot of Tweet from Marilyn Marks regarding "citizen inspections" shouldn't be called audits.	Tweet
1084	2021.11.23 Screenshot of Tweet from Marilyn Marks regarding the 2020 election.	Tweet
1085	2021.09.04 Screenshot of Tweet from Marilyn Marks regarding doing verification work during when GA law permitted it.	Tweet
1086	2021.04.08 Screenshot of Tweet from Kevin Skoglund regarding election not needed to be easy/hard to hack.	Tweet

Exhibit No.	Document Description	Document Type
1087	2021.04.08 Screenshot of Tweet from Kevin Skolgund regarding reliability of election equipment.	Tweet
1088	2021.04.08 Screenshot of Tweet from Kevin Skolgund regarding malware affecting election results.	Tweet
1089	2021.02.10 Screenshot of Tweet from Kevin Skoglund regarding cendors being able to do both hardware and software engineering change orders.	Tweet
1090	2021.02.10 Screenshot of Tweet from Kevin Skoglund regarding his knowledge of de minimis software changes allowed prior to memo from November 2019.	Tweet
1091	2021.02.10 Screenshot of Tweet from Kevin Skoglund replying to Eddie Perez regarding de minimus software changes before 2019.	Tweet
1092	2020.11.16 Screenshot of Tweet from Kevin Skoglund regarding signing letter rebuking Trump's claims as fraud and unsubstantiated.	Tweet
1093	2020.09.19 Screenshot of Tweet from Kevin Skoglund to election officials asking to contact their IT departments for weekly data backups.	Tweet
1094	2020.08.08 Screenshot of Tweet from Ash's Night Fury to Kevin Skoglund regarding	Tweet

Exhibit No.	Document Description	Document Type
	voting systems connected to the internet.	
1095	2020.08.08 Screenshot of Tweet from Kevin Skoglund responding to Ash's Night Fury regarding not observing modems sold to all states listed.	Tweet
1096	2020.11.29 Screenshot of Tweet from Philip Stark replying to RedPillMagaMom regarding his interviews with MSM and Fox.	Tweet
1097	2020.11.20 Screenshot of Tweet from Philip Stark replying to Ben Adida regarding reconciled paper trail and standard ballot accounting.	Tweet
1098	2020.11.08 Screenshot of Tweet from Philip Stark regarding risk-limiting audit.	Tweet
1099	2020.11.08 Image from Philip Stark Tweet. Image of ballots cast in 2020 contest per candidate. Risk limit audit shown for 5%.	Image contained in Tweet
1100	Marilyn Marks Tweet thread, November 21, 2020	<a href="https://twitter.com/MarilynRMarks/1/status/1330418629658218497">https://twitter.com/MarilynRMarks/1/status/1330418629658218497</a>
1101	Marilyn Marks Tweet thread, November 22, 2020	<a href="https://twitter.com/MarilynRMarks/1/status/1330418629658218497">https://twitter.com/MarilynRMarks/1/status/1330418629658218497</a>
1102	Email from Marilyn Marks to Stephen Day, FW: Non-compliant "recount"/"RLA" November 13, 2020	CGG2021001276675 to CGG2021001276680



Exhibit No.	Document Description	Document Type
1103	Jeanne Dufort Tweet, November 22, 2020	<a href="https://twitter.com/dufort_jeanne/status/1330733994070118400">https://twitter.com/dufort_jeanne/status/1330733994070118400</a>
1104	Marilyn Marks Tweet thread, November 14, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1327705945569447936">https://twitter.com/MarilynRMarks1/status/1327705945569447936</a>
1105	Marilyn Marks Tweet thread, October 24, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1320085428062617602">https://twitter.com/MarilynRMarks1/status/1320085428062617602</a>
1106	Marilyn Marks Tweet thread, November 17, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1328745280645246976">https://twitter.com/MarilynRMarks1/status/1328745280645246976</a>
1107	Marilyn Marks Tweet thread, November 17, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1328758039395131392">https://twitter.com/MarilynRMarks1/status/1328758039395131392</a>
1108	Marilyn Marks Tweet thread, January 24, 2021	<a href="https://twitter.com/MarilynRMarks1/status/1353392784724553734">https://twitter.com/MarilynRMarks1/status/1353392784724553734</a>
1109	Marilyn Marks Tweet thread, January 12, 2021	<a href="https://twitter.com/MarilynRMarks1/status/1349014884277768199">https://twitter.com/MarilynRMarks1/status/1349014884277768199</a>
1110	Marilyn Marks Tweet thread, January 1, 2021	<a href="https://twitter.com/MarilynRMarks1/status/1345217977835266048">https://twitter.com/MarilynRMarks1/status/1345217977835266048</a>
1111	2021.02.14 Email to marilyn@uscgg.org referencing attachment "Georgia Republican Party Election Conference Task Force Report-Final.pdf"	CGG20220000001
1112	Georgia Republican Party Election Conference Task Force Report	CGG20220000002-10
1113	2020.12.26 Email to marilyn@uscgg.org re: <a href="https://fb.watch/2DAvX-2yAo/">https://fb.watch/2DAvX-2yAo/</a>	CGG20220000011
1114	2020.12.25 Email to marilyn@uscgg.org re: My counties. (List of counties under her caucus: "They all have populations under 80,000"	CGG20220000012-13

Exhibit No.	Document Description	Document Type
1115	Email to marilyn@uscgg.org dated 12.27.2020 re: Please proof this and let me know. I will attach the letter when I send to him.	CGG20220000014
1116	Email to marilyn@uscgg.org dated 02.21.2021 re: BMDs do not meet the 2016 HB16 requirements	CGG20220000015
1117	Email to Marilyn Marks dated 12.27.2020 re: Early opening of AB mail ballots; "You are not the Grinch!"	CGG20220000016-17
1118	Email to Marilyn Marks dated 02.16.2021 re: Even Gov. Kemp Would Be Denied a Ballot	CGG20220000018-20
1119	Email to Marilyn Marks dated 08.03.2011 re: Excellent Experts' reports served tonight -All public information	CGG20220000021
1120	Email to Marilyn Marks dated 08.14.2021 re: FW: Replace the Dominion System Before the 2022 Primary InsiderAdvantageGeorgia	CGG20220000022-23
1121	Email to Marilyn Marks dated 12.29.2020 re: Ed Voyles	CGG20220000024
1122	Email to Marilyn Marks dated 12.27.2020 re: Lamar County GOP chair	CGG20220000025
1123	Email to Marilyn Marks dated 12.27.2020 re: Lamar County GOP chair	CGG20220000026

Exhibit No.	Document Description	Document Type
1124	Email to Marilyn Marks dated 08.15.2021 re: Replace the Dominion System Before the 2022 Primary InsiderAdvantageGeorgia	CGG20220000027-28
1125	Email to Marilyn Marks dated 02.14.2021. Re: Tip of iceberg disclosure of tabulation and system problems	CGG20220000029
1126	Email to Marilyn Marks dated 10.21.2021 re: Update (Response from Cobb County attorney requesting tomorrow to answer questions)	CGG20220000030
1127	Email to Marilyn Marks dated 09.20.2022 FW: SOS - Expert report affirms accuracy of Antrim County presidential election results	CGG20220000031-32
1128	03.26.2021 Report entitled Analysis of the Antrim County, Michigan November 2020 Election Incident by J. Alex Halderman	CGG20220000033-86
1129	Email to Marilyn Marks dated 12.26.2020 re: 10:45 ET? Re: Zoom Call	CGG20220000087
1130	Email to Marilyn Marks dated 12.27.2020 re: My counties	CGG20220000088-90
1131	Email to Marilyn Marks dated 2020.12.26 re: zoom call	CGG20220000091
1132	Email from Marilyn Marks to Ed Voyles, Misty Hampton, and Cathy Latham dated 02.20.2021 re: Local Option	CGG20220000092

Exhibit No.	Document Description	Document Type
	for HMPB-exists today if lines are longer than 30min	
1133	Georgia Regulation Ga. Comp. R & Regs. R. 183-1-12-.11 Conducting Elections	CGG20220000093-96
1134	Email to Marilyn Marks dated 06.12.2021 to Cathy Latham re: demanding \$75 million refund	CGG20220000097-100
1135	Email to Marilyn Marks dated 12.26.2020 re: 10:45 ET? Re: Zoom Call	CGG20220000101
1136	Email from Marilyn Marks to Cthay Latham, Ed Voyles re: Annotations on Hutton-pulitzer testimony attaching GAsenateJudiciary12.3.2020 Part 1_MRM_jhp2.docx	CGG20220000102
1137	GA Senate Judiciary Subcommittee on Election Law 12.30.2020	CGG20220000103-20
1138	Email from Marilyn Marks to Welch47@protonmail.com; Cathy Latham re: Cobb official recount docs attachments: Official and Complete - Election Summary Report.pdf, Official and Complet - SOVC.pdf	CGG20220000121
1139	Election Summary Report	CGG20220000122
1140	Statement of Votes Cates General Election COBB dated 11.03.2020	CGG20220000123-137

Exhibit No.	Document Description	Document Type
1141	Email from Marilyn Marks to Cathy Latham re: Dominion Contract Info, Attachments: 20190729-FA-Dominion-Contract.pdf, "Pages from Dominion021577-026667-6copy.pdf	CGG20220000138
1142	Master Solution Purchase and Services Agreement between Dominion Voting Systems and Secretary of State of the State of Georgia (July 29, 2019)	CGG20220000139-250
1143	Email from Mike Frontera to Ryan Germany dated 03.02.2020 re:Updated Amendement; Attachment GASOS Amendment 1 03.02.2020.docx	CGG20220000251-256
1144	Amendment I to the Master Solution Ppurchase and Services Agreement between Dominion Voting Systems, Inc. and The Secretary of State of the State of Georgia	CGG20220000257-261
1145	Email from Marilyn Marks to Cathy Latham re: FW: "Emergency" Rule for mandatory early scanning of ballots	CGG20220000262-63
1146	Email from Marilyn Marks to welch47@protonmail.com; Cathy Latham; Pam Ausman re: FW: You Make the Laws. I'll Make ther Rules!"	CGG20220000264-265
1147	Email from Marilyn Marks to Cathy Latham and Ed Volyles re: Authority of County boards to use hand marked paper ballots	CGG20220000266

Exhibit No.	Document Description	Document Type
1148	Report/Presentation: When using BMDs "Wholly Or in Part is Not Practicable"	CGG20220000267-271
1149	Correspondence from Brown to Cheryl Ringer dated 10.03.2020 re: Fulton County Board of Elections' Ongoing Violations of State law	CGG20220000272-276
1150	Article - Georgia's US Senate Runoff Races at Risk - A Modest Proposal for a Defensible Vote Count	CGG20220000277-290
1151	Email from Marilyn Marks dated 07.12.2021 to Cathy Latham re: FW: Essential new report in BMD court case against SOS	CGG20220000291
1152	Expert Report of Andrew W. Appel dated 6.28.2021	CGG20220000292-323
1153	Rule 5.4 Certificate of Service of Discovery (Expert Report of Appel and Halderman)dated 07.01.2021	CGG20220000324-325
1154	Email from Marilyn Marks dated 08.03.2021 re: FW: Excellent Experts' reports served tonight - All public information	CGG20220000326
1155	REBUTTAL REPORT OF ANDREW W. APPEL (July 30, 2021)	CGG20220000327-337
1156	Declaration of J. Alex Halderman dated 08.02.2021	CGG20220000338-361
1157	Eighth Declaration of Philip B. Stark dated 08.02.2021	CGG20220000362-405
1158	Email from Marilyn Marks to Cathy Latham dated 08.03.2021 re: FW: Facing	CGG20220000406-407

Exhibit No.	Document Description	Document Type
	Critical Decisions on Upcoming Municipal Elections	
1159	Email from Marilyn Marks to Cathy Latham re: FW: Halderman report Update	CGG20220000408
1160	Exhibit A to Halderman report	CGG20220000409-419
1161	Transcript of Motions hearing Proceedings Before the Honorable Amy Totenberg dated 11.19.2021	CGG20220000420-539
1162	Curling Plainiffs' Reply in Support of Plaintiffs' Motion to Sever dated 11.15.2021	CGG20220000540-680
1163	Email from Marilyn Marks to Caty Lathat,cc: Ed Voyles re: Judhe Totenberg opinion re: BMD ballots and GA law	CGG20220000681-682
1164	Opinion and Order dated 10.11.2020	CGG20220000683-829
1165	Report - Georgia's US Senate Runoff Races at Risk - A Modest Proposal for a Defensible Vote Count	CGG20220000830-843
1166	Email from Marilyn Marks to Cathy Latham dated 02.28.2021 re: FW: Previous letter re: demanding a475 million refund	CGG20220000844-847
1167	Email from Marilyn Marks to Cathy Latham re: FW: Previous letter re: demanding \$75 million refund	CGG20220000848-851
1168	Email from Marilyn Marksto Ed Voyles and Cathy Latham re: FW: Problems created by	CGG20220000852-853

Exhibit No.	Document Description	Document Type
	omnibus bills - and proposed solutions	
1169	Email from Marilyn Marks to Cathy Latham dated 07.30.2021 re" FW": Prof.Alex Halderman's sealed report is subject of discovery dispute heard on Monday	CGG20220000854-855
1170	Joint Discovery Statement Regarding Access to Plaintiffs' Expert Report and Unduly Burdensome Discovery dated 07.12.2021	CGG20220000856-905
1171	Exhibit B to to Joint Disco Statement	CGG20220000906-912
1172	Transcript of Telephone Conference Proceedings Before the Honorable Amy Totenberg dated 07.26.2021	CGG20220000913-998
1173	Email from Rhonda J. Martin to welch47 and Cathy Lathat re: FW: Proposed Changes to Proposed Rules 183-1-12-12 and 183-1-12-13	CGG20220000999
1174	Martin Memo to State Election Board attaching revisions to Proposed Rules 183-1-12-12 and 183-1-12-13 Tabulating Results and Storage of Returns respectively	CGG20220001000-1009
1175	Email from Marilyn Marks to Cathy Latham, Ed Voyles re: FW: Request to AJC for clarification - FW: Georgia braces for contentious fight over Senated runoff results	CGG20220001010-1014



Exhibit No.	Document Description	Document Type
1176	Email from Marilyn Marks forwarding email from Moghimi, Madeline to Cathy Latham, Ed Voyles, Misty Hampton re: FW: Request to make public comment HB531	CGG2022000101015
1177	Email from Marilyn Marks forwarding email to welch47; Cathy Latham dated 10.22.2021 re "October 28, 2021 re: FW: State Election Board Agenda.pdf	CGG2022000101016
1178	Agenda State Election Board via Webinar (Office of Secretary of State) dated 10.28.2021 9:00 a.m.	CGG2022000101017
1179	Email from Marilyn Marks dated 09.19.2021 forwarding to Cathy Latham re: FW: State Election Board Agenda - September 21, 2021	CGG2022000101018
1180	Agenda State Election Board via Webinar (Office of Secretary of State) dated 09.21.2021 9:00 a.m.	CGG2022000101019-1021
1181	Email from Marilyn Marks to Cathy Latham dated 09.19.2021 re: FW: State Election Board - Notice of Rules Posted for Public Comment	CGG202200010101022
1182	State Election Board Notice of Proposed Rulemaking Revisions to Subject 183-1-12: Preparation for and Conduct of Primaries and Elections	CGG202200010101023-1084

Exhibit No.	Document Description	Document Type
1183	State Election Board Notice of Proposed Rulemaking Revisions to Subject 183-1-14: Absentee Voting	CGG20220001085-1095
1184	Email from Marilyn Marks to Cathy Latham and Ed Voyles dated 12.27.2020 re: Lets's discuss as alternative when we talk	CGG20220001096
1185	Email from Marilyn Marks to Cathy Latham with cc to welch47@protonmail.com re: Marietta tapes	CGG20220001097
1186	Email from Marilyn Marks to Cathy Latham dated 02.21.2021 re: BMDs do not meet the 2016 HB16 requirements	CGG20220001098-1099
1187	Email from Marilyn Marks to Cathy Latham re: Dominion BMD voting system FW: Exerpts from Judge T's opinion and highlights of her opinion	CGG20220001100
1188	Opinion and Order dated 10.11.2020	CGG20220001101-1247
1189	Exhibit 5 Excerpts from 10.11.20 Ruling - Judge Amy Totenberg	CGG20220001248-1251
1190	Email from Marilyn Marks to Cathy Latham dated 08.05.2021 re: Dominion System "reexamination" attaching "Petition Recent annotated.pdf"	CGG20220001252
1191	Correspondence from Marilyn Marks to The Honorable Brad Raffensperger requesting	CGG20220001253-1263

Exhibit No.	Document Description	Document Type
	reexamination of the Dominion Voting System	
1192	Email from Marilyn Marks to Ed Voyles, Cathy Latham dated 12.27.2020 re: Early opening of AB mail ballots	CGG20220001264-1265
1193	Email from Marilyn Marks to Cathy Latham re: Excellent Experts' reports served tonight --All public information	CGG20220001266
1194	Email from Marilyn Marks to Cathy Latham dated 12.26.2020 re: Lamar County GOP Chair	CGG20220001267
1195	Email from Marilyn Marks dated 102.22.2021 to Cathy Latham, Pam Ausman, welch47@protonmail.com re: Marietta tapes	CGG20220001268-1269
1196	Email to Cathy Latham dated 12.26.2020 re: My counties	CGG20220001270-1272
1197	Email from Marilyn Marks to Cathy Latham dated 08.14.2021 re: Replace the Dominion System Before the 2022 Primary   InsiderAdvantageGeorgia	CGG20220001273-1274
1198	Email from marilyn Marks to Ed Voyles and Cathy Latham re: Secret ballot --FW: Election officials travel to Coffee County, Georgia to begin investigation   KDNL	CGG20220001275-1276

Exhibit No.	Document Description	Document Type
1199	Email from Marilyn Marks to Cathy Latham dated 02.14.2021 with cc to Ed Voyles re: Tip of iceberg disclosure of tabulation and system problems	CGG20220001277
1200	Email from Marilyn Marks to welch47@protonmail.com and Cathy Latham dated 10.20.2021 re previous meeting of SEB --FW: Comments on Proposed Rule making with attachments: "CGG Comments on Rulemaking 09.20.21.pdf"	CGG20220001278
1201	Coalition of Good Governance's Summary Comments on Proposed Election Rules	CGG20220001279-1286
1202	Email form Marliyn Marks to Cathy Latham and Ed Voyles dated 02.14.2021 re: Redacted Experts Report filed with Court attachments: "2021-02-12 Halderman Redaction [dckt 1070_0]][1].pdf	CGG20220001287
1203	Declaration of J. Alex Halderman dated 02.12.2021	CGG20220001288-1297
1204	Email to Marilyn Marks dated 02.14.2021. Re: Tip of iceberg disclosure of tabulation and system problems; attaching: "Marks Declaration 20210212 CGG Doc. 1071 CGG Brief on Standing and Exhibits-2.pdf"	CGG20220001298
1205	Supplemental Declaration of Marilyn Marks dated 02.12.2021	CGG20220001299-1330

Exhibit No.	Document Description	Document Type
1206	Email from Marilyn Marks to Cathy Latham with cc to Ed Voyles dated 12.26.2020 re: Transcript of 11/23 Meeting re: Rough draft letter for Blackmon; attaching: "SEBSpecialMtg23Nov2020_ott er.ai partial edits.docx"	CGG20220001331
1207	SEBSpecialMTg23Nov2020 (unofficial rough transcript) 11/23	CGG20220001332-1356
1208	Email from Marilyn Marks to Cathy Latham dated 10.21.2021 re: Update; attaching "Screen shot 2021-10-21 at 11.57.42 AM.png"	CGG20220001357
1209	Highlighted excerpt obtained from Curling case teleconference 10.07.21 Topic -- SOS withholding discovery responses: highlights - "suspected and possibly actual compromises of components of the election system. We are on a public call. So I'm not going to get into specifics about that"	CGG20220001358
1210	Email from Marilyn Marks to Cathy Latham and Ed Voyles dated 12.26.2020 re: What if Coffee County (and maybe other counties) led the way with two security measures?	CGG20220001359
1211	Email from Marilyn Marks to Misty Hampton, Ed Voyles, and Cathy Latham dated 12.30.2020 re: You will find this iinteresting from our	CGG20220001360

Exhibit No.	Document Description	Document Type
	case; attaching: "809-3 Harri declaration.pdf"	
1212	Declaration of Harri Hursti dated 08.24.2020	CGG20220001361

**PLAINTIFFS' OBJECTIONS TO DEFENDANTS' EXHIBIT LIST**

<b>Objection Abbreviation</b>	<b>Objection Explanation</b>
<b>A</b>	<b>Lack of Authenticity.</b> The State has not established that it is a true and correct copy of the document through proper foundation (Fed. R. Evid. 901 & 902)
<b>F</b>	<b>Lack of Foundation.</b> Plaintiffs object to this exhibit on the ground that the foundation necessary for its admission has not been laid and is not laid in the exhibit itself. (Fed. R. Evid. 602)
<b>IS</b>	<b>Improper Summary.</b> Plaintiffs object to this exhibit as an improper summary under Federal Rule of Evidence 1006.
<b>104</b>	<b>Relevance depends on facts not established.</b> Plaintiffs object to this exhibit on the ground that the relevance of this evidence depends on whether a fact exists, and no proof or evidence has been adduced during discovery sufficient to support a finding that the fact does exist.
<b>H</b>	<b>Hearsay.</b> Plaintiffs object to the State introducing this exhibit because it constitutes or contains hearsay and/or hearsay within hearsay and no exception applies. (Fed. R. Evid. 801 & 802, 805)
<b>NR</b>	<b>Not Relevant.</b> Plaintiffs object to this exhibit because it is not relevant to any issue to be decided in this litigation. (Fed. R. Evid. 401 & 402)
<b>403</b>	<b>FRE 403.</b> Plaintiffs object to this exhibit because its probative value is substantially outweighed by a danger of one or more of the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. (Fed. R. Evid. 403)
<b>NP</b>	<b>Not Produced During Discovery.</b> Plaintiffs object to this exhibit because the document and/or underlying data was not produced during the course of discovery.
<b>I</b>	<b>Incomplete.</b> Plaintiffs object to this exhibit because the exhibit, as submitted, does not contain the complete document. (Fed. R. Evid. 106.) Plaintiffs reserves all objections as to the remainder of the document.
<b>M</b>	<b>Multiple Documents.</b> Plaintiffs object to this exhibit because it contains more than one document. Plaintiffs reserve all rights to object on additional grounds to any individual document.
<b>Q</b>	<b>Quality.</b> Plaintiffs object to this exhibit because the exhibit, as submitted, is illegible or otherwise of low quality. Plaintiffs reserve all other objections.
<b>OW</b>	<b>Original Writing.</b> Plaintiffs object to this exhibit because it is not an original writing, recording, or photograph.

Objection Abbreviation	Objection Explanation
<b>NE</b>	<b>Not Evidence.</b> Plaintiffs object to this exhibit because it is a statute, brief, pleading, order, discovery request, deposition transcript, hearing transcript, expert report, expert analysis, or declaration or an exhibit thereto and is not evidence.
<b>T</b>	<b>Transcript.</b> Plaintiffs object to this exhibit because it is a deposition transcript and it is not admissible as evidence under Federal Rule of Civil Procedure 32. Plaintiffs reserve the right to make any objection should the State attempt to introduce any particular content of the transcript into evidence.
<b>C</b>	<b>Cumulative.</b> Plaintiffs objects to this exhibit on the ground that it is duplicative and/or cumulative of other exhibits.
<b>PK</b>	<b>No Personal Knowledge.</b> Plaintiffs object to this exhibit because the author either does not have personal knowledge of the information contained within, or the basis of that knowledge has not been established. (Fed. R. Evid. 602)
<b>Unknown</b>	<b>Unknown Document.</b> Plaintiffs object to this exhibit because the State did not provide a copy of the document to Plaintiffs pretrial, and thus Plaintiffs is without the ability to provide objections. Plaintiffs reserve the ability to provide any and all objections once the State provides Plaintiffs with copies of the proposed exhibits.
<b>ID</b>	<b>Improper Description.</b> Plaintiffs object to this exhibit because the description fails to accurately indicate what document it refers to, and thus Plaintiffs is without ability to provide objections. Plaintiffs reserve the ability to provide any and all objections once the State provides a corrected description.

Exhibit No	Document Description	Document Type	Objections
1	2018.08.14 <b>Declaration of Merritt Beaver</b> (Exhibit 1 to Defs' Kemp and State Election Board Response to Motions for Preliminary Injunction)	Declaration	NE; H; F; C
2	2018.08.14 <b>Declaration of Chris Harvey</b> (Exhibit 2 to Defs' Kemp	Declaration	NE; H; F



Exhibit No	Document Description	Document Type	Objections
	and State Election Board Response to Motions for Preliminary Injunction		
3	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - <b>Declaration of Michael Shamos, Ph.D., J.D.</b>	Declaration	NE; H; F
4	Exhibit A to Declaration of Michael Shamos, Ph.D 472-1: <b>Resume of Michael Ian Shamos</b>	Resume	NE; H; F;
5	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit B - <b>Declaration of S. Merritt Beaver</b>	Declaration	NE; H; F
6	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit C - <b>Declaration of Theresa Payton</b>	Declaration	NE; H; F
7	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit D - <b>Declaration of Michael Barnes</b>	Declaration	NE; H; F;

Exhibit No	Document Description	Document Type	Objections
8	Exhibit A to <b>Declaration of Michael Barnes</b> - Certified copy of the Direct Record Electronic Voting Machine Recap for Fulton County precincts 06G, 02J, and 02K at the Grady High School Polling Location from the 2018 General Election Held on November 6, 2018.	Certified Record	OW; H; F; NR
9	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit E - Rockdale Co. Response to Subpoena	Pleading - Response	NE; H; F;
10	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit F - <b>Declaration of Chatham Co Elections Supervisor, Russell Bridges</b>	Declaration	NE; H; F;
11	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit G - Michael Barnes Deposition Excerpts	Deposition Excerpts - Michael Barnes Deposition	T; H; F; I; NE

Exhibit No	Document Description	Document Type	Objections
12	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit H - Jennifer Doran Deposition Excerpts	Deposition Excerpts - Jennifer Doran Deposition	T; H; F; I; NE
13	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit I - <b>T. Lynn Ledford Deposition Excerpts</b>	Deposition Excerpts - Lynn Ledford Deposition	T; H; F; I; NE
14	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit J - <b>Michael Barnes Deposition Transcript</b>	Deposition Transcript	T; H; F; NE
15	2020.08.24 Exhibit 1 to Defs' Emergency Mot for Expedited Discovery for Preliminary Injunction Hearing - State Defs' Second RPDs to Curling Plaintiffs dated 08.21.2020	Discovery	NE; NR; H; F
16	2020.08.24 Exhibit 2 to Defs' Emergency Mot for Expedited Discovery for Preliminary Injunction Hearing - Email thread from Cross to Belifnante et al re Curling - RPDs to	Email	NE; NR; 403; H; F;

Exhibit No	Document Description	Document Type	Objections
	Curling Plaintiffs and expedited discovery concerns dated 08.21.2020		
17	2020.08.25 Exhibit 1 to Response re Motion for Preliminary Injunction on paper Pollbook Backups - <b>Affidavit Declaration of Chris Harvey</b>	Declaration	NE; H; F; NR
18	2020.08.26 Exhibit 1 (A) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Exhibit A - Dec. of Dr. Eric D. Coomer</b>	Declaration	NE; H; F;
19	2020.08.26 Exhibit 2 (B) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Exhibit B - Dec. of Juan E. Gilbert, Ph.D</b>	Declaration	NE; H; F
20	2020.08.26 Exhibit 3 (C) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Exhibit C - Part 1 - Deposition of J. Alex Halderman, Ph.D</b>	Deposition	T; NE; H; F;

Exhibit No	Document Description	Document Type	Objections
21	2020.08.26 Exhibit 4 (C-2) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit 2 - Part 2 of 3 - <b>Deposition of J. Alex Halderman, Ph.D and (Exs. 1-9)</b>	Compilation of Halderman Deposition Exhibits 1 - 9	NE; M; H; F; T
22	Halderman Deposition Exhibit 1 - Expert Report of J.Alex Halderman	Deposition Exhibit	NE; NR ; H; F
23	Halderman Deposition Exhibit 2 - <b>Expert Report of J.Alex Halderman</b>	Deposition Exhibit	NE; A; H; F; A
24	Halderman Deposition Exhibit <b>2 (A)</b> of Expert Report of J.Alex Halderman - <b>Halderman CV</b>	Deposition Exhibit	NE; H; F;
25	Halderman Deposition Exhibit 3 - <b>Supplement to the Expert Report of H. Alex Halderman</b>	Deposition Exhibit	NE; H; F
26	Halderman Deposition Exhibit 4 - Website page - Election Verification Network Agenda for 2019 Conference dated 02.18.2020	Deposition Exhibit	H; F; A; 104; NR
27	Halderman Deposition Exhibit 5 - Website page - Election Verification Network About Us page	Deposition Exhibit	H; F; A; 104; NR

Exhibit No	Document Description	Document Type	Objections
28	Halderman Deposition Exhibit 6 - U.S. House Appropriations Subcommittee on Financial Service and General Government "Election Security: Ensuring the Integrity of U.S. Election Systems" February 17, 2019	Deposition Exhibit	H; F;
29	Halderman Deposition Exhibit 7- U.S. Senate Select Committee on Intelligence Russian Interference in the 2016 U.S. Elections - Expert Testimony by J. Alex Halderman Professor of Computer Science, University of Michigan dated 06.21.2017	Deposition Exhibit	H; F
30	Halderman Deposition Exhibit 8 - Redacted Report of the Select Committee on Intelligence United States Senate on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election Volume 1: Russian Efforts Against Election Infrastructure with Additional Views.	Deposition Exhibit	H; F; I;
31	Halderman Deposition Exhibit 9 - New York Times article, "I Hacked an Election by J. Alex Halderman. So Can the	Deposition Exhibit	H; F; I; OW

Exhibit No.	Document Description	Document Type	Objections
	Russians" dated April 5, 2018		
32	2020.08.26 Exhibit 5 (C-3) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit 3 - Part 3 of 3 - <b>Deposition of J. Alex Halderman, Ph.D and (Exs. 10-15)</b>	Compilation of Halderman Deposition Exhibits 10 through 15	H; F; M; C
33	Halderman Deposition Exhibit No. 10 - 2017.06.21 Article co-authored by Jay Halderman entitled "Here's how to keep Russian hackers from attacking the 2018 elections"	Deposition Exhibit	H; F; C;
34	Halderman Deposition Exhibit No. 11 - Medium.com online article entitled Want to Know if the Election was Hacked? Look at the Ballots authored by J. Alex Halderman	Deposition Exhibit	H; F; C;
35	Halderman Deposition Exhibit No. 12 alumnus.alumni.umrich.edu (University of Michigan) online article entitled Hacking the Vote: It's Easier Than You Thing by Steve	Deposition Exhibit	H; F; C; 104; PK; NR

Exhibit No	Document Description	Document Type	Objections
	Friess - Professor J. Alex Halderman has made a career studying electronic voting security...		
36	Halderman Deposition Exhibit No. 13 - U.S. Patent No. 8,033,463B@ dated 10.11.2011 by Felten for System and Method for Machine-Assisted Election Auditing	Deposition Exhibit	NR
37	Verified Voting Foundation article entitled Principles for New Voting Systems dated 02.01.2015	Deposition Exhibit	H; F; C; 104; PK; NR
38	Halderman Deposition Exhibit No. 15 - Undated University of Michigan article entitled "Can Voters Detect Malicious Manipulation of Ballot Marking Devices?" co-authored by J. Alex Halderman	Deposition Exhibit	H; F; C
39	Exhibit 6 (D) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Declaration of Jack Cobb</b>	Declaration	H; F; NE



Exhibit No	Document Description	Document Type	Objections
40	Exhibit 7 (E) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Declaration of Jaun E. Gilbert, PH.D.</b>	Declaration	NE; H; F; M
41	Exhibit 8 (F) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Declaration of Mark Riccobono</b>	Declaration	NE; H; F; M
42	Exhibit 9 (G) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - <b>Supplemental Declaration of Chris Harvey</b>	Declaration	NE; H; F; NR

Exhibit No	Document Description	Document Type	Objections
43	Exhibit 1 (A) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - Supplemental <b>Declaration of Dr. Eric Coomer</b>	Declaration	NE; H; F;
44	Exhibit 2 (B) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - <b>Declaration of Dr. Benjamin Adida</b>	Declaration	NE; H; F
45	Exhibit 3 (C) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and	Declaration	NE; H; F; NR; M

Exhibit No	Document Description	Document Type	Objections
	Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - <b>Supplemental Declaration of Chris Harvey</b>		
46	Exhibit 1 (A) to SURREPLY BRIEF re 785 MOTION for Preliminary Injunction State Defendants' Surreply in Opposition to Curling Plaintiffs' Fourth Preliminary Injunction Motion - <b>Supplemental Declaration of Jack Cobb</b>	Declaration	NE; H; F; 104; NR
47	Exhibit 2 (B) to SURREPLY BRIEF re 785 MOTION for Preliminary Injunction State Defendants' Surreply in Opposition to Curling Plaintiffs' Fourth Preliminary Injunction Motion - <b>Supplemental Declaration of Chris Harvey</b>	Declaration	NE; H; F; NR; 104
48	State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction	Pleading	NE; NR; H; F

Exhibit No	Document Description	Document Type	Objections
49	Exhibit 1 to State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction - Declaration of Derrick Gilstrap	Declaration	NE; H; F;
50	Exhibit 2 to State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction - Online article from Savannah now entitled "Recount results in: Derek Mallow wins Georgia House race by 19 votes authored by DeAnn Komanecky	Article	H; F; PK; 104; NR
51	2019.07.25 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 1 of 2	Hearing Transcript	NE; H; F; C
52	2019.07.26 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 2 of 2	Hearing Transcript	NE; H; F; C
53	2020.09.10 Hearing Transcript on Preliminary Injunction Proceedings before the	Hearing Transcript	NE; H; F; C

Exhibit No	Document Description	Document Type	Objections
	Hon. Amy Totenberg Volume 1		
54	2020.09.11 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 2	Hearing Transcript	NE; H; F; C
55	2020.09.14 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 3	Hearing Transcript	NE; H; F; C
56	Appel, Andrew 2022.01.07 Deposition Exhibit 1 - Notice of Deposition of Andrew W. Appel	Deposition Exhibit	NE; NR; F;
57	Appel, Andrew 2022.01.07 Deposition Exhibit 2 - Declaration of Andrew W.Appel in Support of Motion for Preliminary Injunction	Deposition Exhibit	NE; H; F; M
58	Appel, Andrew 2022.01.07 Deposition Exhibit 3 - Expert Review of Andrew W. Appel,	Deposition Exhibit	NE; H; F
59	Appel, Andrew 2022.01.07 Deposition Exhibit 4 - Declaration of Andrew W. Appel iso Mot for PI	Deposition Exhibit	NE; H; F
60	Appel, Andrew 2022.01.07 Deposition Exhibit 5 -	Deposition Exhibit	NE; H; F

Exhibit No	Document Description	Document Type	Objections
	Declaration of Andrew W. Appel iso Mot for PI		
61	Appel, Andrew 2022.01.07 Deposition Exhibit 6 - Declaration of Juan E. Gilbert, Ph.D	Deposition Exhibit	NE; H; F; M
62	Appel, Andrew 2022.01.07 Deposition Exhibit 7 - State Defs' Expert Disclosures - Reports	Deposition Exhibit	NE; NR; F; M; H
63	Appel, Andrew 2022.01.07 Deposition Exhibit 8 - Rebuttal Report of Andrew W. Appel, 07/30/21	Deposition Exhibit	NE; H; F
64	Appel, Andrew 2022.01.07 Deposition Exhibit 9 - Freedom to Tinker article entitle, Georgia's Election Certification Avoided an EvenWorse Nightmare That's Just Waiting to Happen Next Time	Deposition Exhibit	H; F; PK; A; 104; NR
65	Appel, Andrew 2022.01.07 Deposition Exhibit 10 - Freedom to Tinker article entitled, Did Sean Hannity misquote me?	Deposition Exhibit	H; F; PK; A; 104; NR
66	Appel, Andrew 2022.01.07 Deposition Exhibit 11 - Freedom to Tinker article entitled, Voting Machines I Recommend	Deposition Exhibit	H; F; PK; A; 104; NR

Exhibit No	Document Description	Document Type	Objections
67	Appel, Andrew 2022.01.07 Deposition Exhibit 12 - Document entitled Scientistssay no credible evidence ofcomputer fraud in the 2020 election outcome, but policy makers must work with experts to imporve confidence	Deposition Exhibit	H; F; A
68	Barnes, Michael 2019.06.27 Deposition Exhibit 20 - Defendants Secretary of State, State Election Board, and State Election Board Members' Response to Order Dated April 16, 2019	Deposition Exhibit	NE: H; F;
69	Barnes, Michael 2019.06.27 Deposition Exhibit 21 - E- mail with attachment to Milsteen from Marks, 10/11/17, Bates labeled CGG 1 - 190	Deposition Exhibit	M; H; F; Q
70	Barnes, Michael 2019.06.27 Deposition Exhibit 22 - Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 12.4 Challenge Board	Deposition Exhibit	F; 104; I; NR; H
71	Barnes, Michael 2019.06.27 Deposition Exhibit 23 - Diebold Election Systems, Inc. 2005 GEMS 1.18 User's	Deposition Exhibit	F; 104; I; NR; H

Exhibit No	Document Description	Document Type	Objections
	Guide, 2.3 Deleting a Database		
72	Barnes, Michael 2019.06.27 Deposition Exhibit 24 - Ballot image printout from GEMS computer	Deposition Exhibit	NR; 104; F; A; H
73	Barnes, Michael 2019.06.27 Deposition Exhibit 25 - Ballot image report from a GEMS computer	Deposition Exhibit	NR; A; F; H
74	Barnes, Michael 2019.06.27 Deposition Exhibit 26 - Handwritten page	Deposition Exhibit	NR; A; F; H
75	Barnes, Michael 2019.06.27 Deposition Exhibit 27 - Direct Record Electronic Voting Machine Recap records	Deposition Exhibit	NR; F; H
76	Barnes, Michael 2019.06.27 Deposition Exhibit 28 - Copy of photograph	Deposition Exhibit	OW; A; F; Q
77	Barnes, Michael 2019.06.27 Deposition Exhibit 29 - USA vs. Netyksho, et al. Indictment	Deposition Exhibit	NE; H; F;
78	Barnes, Michael 2019.06.27 Deposition Exhibit 30 - Russian Targeting of Election Infrastructure During the 2016 Election: Summary of Initial Findings and	Deposition Exhibit	A; F; H



Exhibit No	Document Description	Document Type	Objections
	Recommendations, May 8, 2018		
79	Barnes, Michael 2019.06.27 Deposition Exhibit 31 - "Who, What, Why" article titled "Kemp's Aggressive Gambit to Distract from Election Security Crisis."	Deposition Exhibit	PK; H; F; 403
80	Barnes, Michael 2019.06.27 Deposition Exhibit 32 - Press release from the Secretary of State's office entitled, After Failed Hacking Attempt SOS Launches Investigation into Georgia Democratic Party	Deposition Exhibit	H; F;
81	Barnes, Michael 2022.02.11 Deposition Exhibit 1 - Curling Plaintiffs Third Amd NOD of Office of the Secretary of the State, no Bates Numbers	Deposition Exhibit	NE; H; F; NR
82	Barnes, Michael 2022.02.11 Deposition Exhibit 2 - Michael Barnes LinkedIn Profile - No Bates Numbers	Deposition Exhibit	H; F; 104; NR
83	Barnes, Michael 2022.02.11 Deposition Exhibit 3 - Michael Barnes LinkedIn Profile - No Bates Numbers	Deposition Exhibit	H; F; 104; NR

Exhibit No	Document Description	Document Type	Objections
84	Barnes, Michael 2022.02.11 Deposition Exhibit 4 - Email chain dated January 2020	Deposition Exhibit	H; F
85	Barnes, Michael 2022.02.11 Deposition Exhibit 5 - Email chain dated January 2020	Deposition Exhibit	H; F
86	Barnes, Michael 2022.02.11 Deposition Exhibit 6 - Email chain dated February 2020	Deposition Exhibit	H; F
87	Barnes, Michael 2022.02.11 Deposition Exhibit 7 - Email chain dated February 2020	Deposition Exhibit	H; F
88	Barnes, Michael 2022.02.11 Deposition Exhibit 8 - Email chain dated February 2020	Deposition Exhibit	H; F
89	Barnes, Michael 2022.02.11 Deposition Exhibit 9 - Email chain dated May 2020	Deposition Exhibit	H; F; PK;
90	Barnes, Michael 2022.02.11 Deposition Exhibit 10 - Email dated 06/01/2020 from Scott Tucker to Gabriel Sterling and others	Deposition Exhibit	H; F; PK; 104; NR
91	Barnes, Michael 2022.02.11 Deposition Exhibit 11 -	Deposition Exhibit	H; F; PK; 104; NR

Exhibit No	Document Description	Document Type	Objections
	Email dated 06/01/2020 from Scott Tucker to Gabriel Sterling and others		
92	Barnes, Michael 2022.02.11 Deposition Exhibit 12 - Email dated 06/01/2020	Deposition Exhibit	H; F; 104; PK; 104; NR
93	Barnes, Michael 2022.02.11 Deposition Exhibit 13 Email chain dated 06/03/20 20	Deposition Exhibit	H; F; 104; PK; 104; NR
94	Barnes, Michael 2022.02.11 Deposition Exhibit 14 - Email chain dated 06/20/2020	Deposition Exhibit	H; F; 104; PK; 104; NR
95	Barnes, Michael 2022.02.11 Deposition Exhibit 15 - Email chain dated 06/20/2020	Deposition Exhibit	H; F; PK;
96	Barnes, Michael 2022.02.11 Deposition Exhibit 16 - Email chain dated 06/20/2020	Deposition Exhibit	H; F; PK
97	Barnes, Michael 2022.02.11 Deposition Exhibit 17 - Email chain dated 06/20/2020	Deposition Exhibit	H; F; PK
98	Barnes, Michael 2022.02.11 Deposition Exhibit 18 - Email chain dated 06/20/2020	Deposition Exhibit	H; F; PK;
99	Barnes, Michael 2022.02.11 Deposition Exhibit 19 - Email dated 06/11/2020 fro Cynthia Willingham to Scott Tucker and Others	Deposition Exhibit	H; F;

<b>Exhibit No</b>	<b>Document Description</b>	<b>Document Type</b>	<b>Objections</b>
100	Barnes, Michael 2022.02.11 Deposition Exhibit 20 - Email chain dated 06/20/2020	Deposition Exhibit	H; F; PK
101	Barnes, Michael 2022.02.11 Deposition Exhibit 21 - Email chain dated 06/20/2020	Deposition Exhibit	H; F; PK
102	Barnes, Michael 2022.02.11 Deposition Exhibit 22- Email chain dated July 2020	Deposition Exhibit	H; F;
103	Barnes, Michael 2022.02.11 Deposition Exhibit 23 - Email chain dated August 2020	Deposition Exhibit	H; F
104	Barnes, Michael 2022.02.11 Deposition Exhibit 24 - Email chain dated August 2020	Deposition Exhibit	H; F;
105	Barnes, Michael 2022.02.11 Deposition Exhibit 25 - Email chain dated September 2020	Deposition Exhibit	H; F
106	Barnes, Michael 2022.02.11 Deposition Exhibit 26 - Email chain dated September 2020	Deposition Exhibit	H; F
107	Barron, Richard 2022.01.31 Deposition Exhibit 1 - 1-18- 22, Curling Plaintiffs' Third Amended Notice of Deposition of Fulton County Defendants re:	Deposition Exhibit	H; F; NR

Exhibit No	Document Description	Document Type	Objections
	The above-captioned action.		
108	Barron, Richard 2022.01.31 Deposition Exhibit 9 - 466, 9-29-20, E-mail string from Scott Tucker to Blake Evans re:Two ballots printing	Deposition Exhibit	H; F
109	Barron, Richard 2022.01.31 Deposition Exhibit 10 - 06.09.2020 - E-mail string from Chris Harvey to Richard Barron 16 re: Fulton County - Machines Down and Polling Places Not Open.	Deposition Exhibit	H; F; PK
110	Barron, Richard 2022.01.31 Deposition Exhibit 11 - Withdrawn by counsel	Deposition Exhibit	Unknown; NR
111	Barron, Richard 2022.01.31 Deposition Exhibit 13 - 8-11- 20, E- mail string from Blake Evans to Richard Barron, Dwight Brower, Sharon Benjamin and Johnny Harris re: Elections complaint from Thomas Elliott.	Deposition Exhibit	H; F; PK
112	Barron, Richard 2022.01.31 Deposition Exhibit 19 - 9-10- 20, E- mail string from Richard Barron to Brigitte Bailey, Gabriel	Deposition Exhibit	H; F; PK

Exhibit No	Document Description	Document Type	Objections
	Sterling and Dwight Brower re: Fulton Advance Voting Issue.		
113	Barron, Richard 2022.01.31 Deposition Exhibit 25 - PowerPoint re: Fulton Election Day Issues	Deposition Exhibit	H; F; PK
114	Barron, Richard 2022.01.31 Deposition Exhibit 26 - 06.09.2020 E-mail string from Ryan German to Frances Watson and Chris Harvey re: Polling Machine Issue	Deposition Exhibit	H; F; PK
115	Barron, Richard 2022.01.31 Deposition Exhibit 27 - 07.16.2020 E-mail string from Richard Barron to Julie Houk and Ryan Germany re: Urgent demands 10 to send corrected absentee ballots to Fulton Co. Voters...	Deposition Exhibit	H; F; PK
116	Barron, Richard 2022.01.31 Deposition Exhibit 31 - 12-14- 18, E- mail from Richard Barron to list re: Voting system input from Fulton County, and 1-3-19 E- mail from Joseph Kirk to list re: My thoughts about our next voting system.	Deposition Exhibit	H; F
117	Barron, Richard 2022.01.31 Deposition	Deposition Exhibit	Unknown; NR

Exhibit No	Document Description	Document Type	Objections
	Exhibit 32 (Exhibit Withdrawn by counsel)		
118	Barron, Richard 2022.01.31 Deposition Exhibit 33 - 09.17.19 Email string from Gabriel Sterling to Chris harvey re: Fulton County ExpressPolls	Deposition Exhibit	H; F
119	Barron, Richard 2022.01.31 Deposition Exhibit 34 - 11.02.2020, Seven Hills Strategies report re: State Election Board	Deposition Exhibit	H; F; PK
120	Barron, Richard 2022.01.31 Deposition Exhibit 35 - 01.12.2021 Seven Hills Strategies reort re: State Election Board - Post Election Executive Summary	Deposition Exhibit	H; F; PK
121	Beaver, Merritt 2022.02.22 Deposition Exhibit 1 - Curling Plaintiffs'Second AMD NOD of the Office of the Secretary of State	Deposition Exhibit	NE; H; F
122	Beaver, Merritt 2022.02.22 Deposition Exhibit 2 - Declaration of Merritt Beaver	Deposition Exhibit	NE; H; F; C
123	Beaver, Merritt 2022.02.22 Deposition Exhibit 3 - Declaration of S. Merritt Beaver	Deposition Exhibit	NE; H; F; C

Exhibit No	Document Description	Document Type	Objections
124	Beaver, Merritt 2022.02.22 Deposition Exhibit 4 - LinkedIn Printout of Merritt Beaver's profile page	Deposition Exhibit	H; F
125	Beaver, Merritt 2022.02.22 Deposition Exhibit 5 - AJC article entitled Case files discredit Kemp's accusation that democrats tried to hack Georgia election	Deposition Exhibit	PK; H; F
126	Beaver, Merritt 2022.02.22 Deposition Exhibit 6 - 07.01.2020 email string the with top from Kevin Robertson	Deposition Exhibit	H; F
127	Beaver, Merritt 2022.02.22 Deposition Exhibit 7 - Email string dated 12/02/2020 with the top from Kay Stinson	Deposition Exhibit	H; F
128	Beaver, Merritt 2022.02.22 Deposition Exhibit 8 - ImageCast X ballot marking device document	Deposition Exhibit	NE; H; F
129	Beaver, Merritt 2022.02.22 Deposition Exhibit 9 - Document entitled Information Technology Security Program Charter	Deposition Exhibit	A; H; F



Exhibit No	Document Description	Document Type	Objections
130	Beaver, Merritt 2022.02.22 Deposition Exhibit 10 - Document dated 07.14.2020 entitled Fortalice Solutions Web Vulnerability Remediation Checks Secretary of State Georgia draft	Deposition Exhibit	A; H; F; 104; NR
131	Beaver, Merritt 2022.02.22 Deposition Exhibit 11 - 07.10.2020 Email string with the top from Dave Hamilton	Deposition Exhibit	H; F
132	Beaver, Merritt 2022.02.22 Deposition Exhibit 12 - E-mail string with the top from Chris Furtick dated 11.02.2020	Deposition Exhibit	H; F; PK
133	Beaver, Merritt 2022.02.22 Deposition Exhibit 13 - 04.05.2019 email string with the top from Kevin Rayburn	Deposition Exhibit	H; F; C
134	Beaver, Merritt 2022.02.22 Deposition Exhibit 14 - 2019.04.03 Emal string with the top from Josh Hood	Deposition Exhibit	H; F; 104; NR
135	Beaver, Merritt 2022.02.22 Deposition Exhibit 15 - 08.13.2020 email string with the top from Dave Hamilton	Deposition Exhibit	H; F;
136	Beaver, Merritt 2022.02.22 Deposition Exhibit 16 -	Deposition Exhibit	H; F

Exhibit No	Document Description	Document Type	Objections
	12.30.2020 Email string with the top from Chris Harvey		
137	Beaver, Merritt 2022.02.22 Deposition Exhibit 17 - 12.21.2020 E-mail string with the top from Dave Hamilton	Deposition Exhibit	H; F
138	Beaver, Merritt 2022.02.22 Deposition Exhibit 18 - 2020 Security of the voter registration system artifacts and attestation pursuant to Rule 590-8-3-01	Deposition Exhibit	H; F;
139	Beaver, Merritt 2022.02.22 Deposition Exhibit 19 - 08.21.2020 Email from Dave Hamilton	Deposition Exhibit	H; F;
140	Beaver, Merritt 2022.02.22 Deposition Exhibit 20 - 12.31.2020 Email string with the top from Angelos Keromytis	Deposition Exhibit	M; H; F
141	Beaver, Merritt 2022.02.22 Deposition Exhibit 21 - 09.17.2020 Email string with the top from Terry Jones	Deposition Exhibit	H; F; 104; NR
142	Beaver, Merritt 2022.02.22 Deposition Exhibit 22 - Document entitled Fortalice Rules of Engagement of Georgia	Deposition Exhibit	H; F; 104; NR

Exhibit No	Document Description	Document Type	Objections
	Secretary of State Memorandum		
143	Beaver, Merritt 2022.03.10 Deposition Exhibit 23 - 07.29.2020 Email string with the top from Dave Hamilton	Deposition Exhibit	H; F
144	Beaver, Merritt 2022.02.22 Deposition Exhibit 24 - 11.12.2020 Email string with the top from Merritt Beaver	Deposition Exhibit	H; F
145	Beaver, Merritt 2022.02.22 Deposition Exhibit 25 - 11.03.2020 email Email from Jason Matthews	Deposition Exhibit	H; F
146	Beaver, Merritt 2022.03.10 Deposition Exhibit 26 - 08.14.2020 Email string with the top from Kevin Robertson	Deposition Exhibit	H; F
147	Beaver, Merritt 2022.02.22 Deposition Exhibit 27 - 03.03.2019 Email string with the top from Merritt Beaver	Deposition Exhibit	H; F
148	Beaver, Merritt 2022.02.22 Deposition Exhibit 28 - 08.14.2020 Email from Nick Salsman	Deposition Exhibit	H; F; 104
149	Beaver, Merritt 2022.02.22 Deposition Exhibit 29 - 2020.06.15 Document	Deposition Exhibit	A; H; F PK; 104; NR

Exhibit No	Document Description	Document Type	Objections
	entitled Election Office Notes		
150	Beaver, Merritt 2022.03.10 Deposition Exhibit 1 - 2020.05.19 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia DRAFT	Deposition Exhibit	A; H; F; I; 104; NR
151	Beaver, Merritt 2022.03.10 Deposition Exhibit 2 - 2020.07.09 Fortalice Solutions Firmware Comparison and Configuration Analysis, Secretary of Sate Georgia, DRAFT	Deposition Exhibit	A; H; F; I; 104; NR
152	Beaver, Merritt 2022.03.10 Deposition Exhibit 3 - 08.25.2020 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia, DRAFT	Deposition Exhibit	A; H; F; I;
153	Beaver, Merritt 2022.03.10 Deposition Exhibit 4 - 08.25.2020 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia, DRAFT	Deposition Exhibit	A; H; F; I;
154	Beaver, Merritt 2022.03.10 Deposition Exhibit 5 - 08.25.2020 Fortalice Solutions Technical Assessment	Deposition Exhibit	A; H; F; I;

Exhibit No	Document Description	Document Type	Objections
	Prepared for Secretary of State Georgia, DRAFT		
155	Beaver, Merritt 2022.03.10 Deposition Exhibit 7 - 11.25.2020 Secretary of State Georgia, Fulton County Laptop Forensic Review	Deposition Exhibit	A; H; F; Q;
156	Beaver, Merritt 2022.03.10 Deposition Exhibit 8 - Email string	Deposition Exhibit	H; F;
157	Beaver, Merritt 2022.03.10 Deposition Exhibit 9 - Email String	Deposition Exhibit	H; F; C
158	Beaver, Merritt 2022.03.10 Deposition Exhibit 10 - 07.01.2021 Security Analysis of Georgia's ImageCast X Ballot Marking Devices, Expert Report Submitted on Behalf of Plaintiffs Donna Curling, et al., authored by Prof.J. Alex Halderman, Ph.D. with the assistance of Prof. Drew Springall, Ph.D.	Deposition Exhibit	NE; H; F; C
159	Beaver, Merritt 2022.03.10 Deposition Exhibit 11 - Curling Plaintiffs' Fifth AMD NOC of Office of the Secretary of State	Deposition Exhibit	NE; H; F; NR

Exhibit No	Document Description	Document Type	Objections
160	Beaver, Merritt 2022.03.10 Deposition Exhibit 12 - CGG Recording	Deposition Exhibit	OW; H; F
161	Beaver, Merritt 2022.03.10 Deposition Exhibit 13 - 11.17.2020 Official Election Bulletin, dated November 17, 2020, from Chris Harvey, Elections Division Director, to County Election Officials and County Registrars RE: Open Records Requests - Security Information Exempt	Deposition Exhibit	H; F; 104; NR
162	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition Exhibit 1 - Notice of Deposition	Deposition Exhibit	NE; H; F; NR
163	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 2 - Objections to NOD	Deposition Exhibit	NE; 104; F; NR; H
164	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 3 - Plaintiffs' Third AMD Complaint	Deposition Exhibit	NE; F; H

Exhibit No	Document Description	Document Type	Objections
165	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 4 - First Supplemental Complaint of Plaintiffs Coalition for Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett	Deposition Exhibit	NE; F; H
166	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 5 - Supplemental Declaration of Marilyn Marks	Deposition Exhibit	NE; F; M; H
167	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 6 - 2017 Form 990-EZ	Deposition Exhibit	NR
168	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 7 - 2018 Form 990	Deposition Exhibit	NR
169	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6)	Deposition Exhibit	NR

Exhibit No	Document Description	Document Type	Objections
	Deposition- Deposition Exhibit 8 - 2019 Form 990		
170	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 9 - Plaintiffs' Notice of Filing Declaration	Deposition Exhibit	NE; M; H; F; NR
171	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 10 - Coalition Plaintiffs' Detailed Specification In Support of Motion for Attorneys' Fees	Deposition Exhibit	NE; NR
172	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 11 - New York correspondence from January 2021 citing Curling	Deposition Exhibit	403; C; NR
173	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 12 - NCSBOE letter from 2019	Deposition Exhibit	403; C; NR



Exhibit No	Document Description	Document Type	Objections
174	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 13 - E-mails, 9/26/19, CGG2021001277506	Deposition Exhibit	403; C; NR
175	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 14 - 3/4/21 letter from CGG to Georgia Republican Leaders	Deposition Exhibit	
176	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 15 - Mission Statement - Coalition for Good Governance	Deposition Exhibit	
177	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 16 - Articles of Incorporation for a Nonprofit Corporation	Deposition Exhibit	
178	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6)	Deposition Exhibit	

Exhibit No	Document Description	Document Type	Objections
	Deposition- Deposition Exhibit 17 - Who We Are - Coalition for Good Governance		
179	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 18 - CGG Board Discussion Package	Deposition Exhibit	M; NE; H; F; 104; NR
180	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 19 - Fundraising message	Deposition Exhibit	104; F; 403; C; NR
181	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 20 - Fundraising message during 2020	Deposition Exhibit	104; F; 403; C; NR
182	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 21 - Donate - Coalition for Good Governance	Deposition Exhibit	104; F; 403; C; NR
183	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 22 -	Deposition Exhibit	104; F; 403; C; NR

Exhibit No	Document Description	Document Type	Objections
	Home page - Coalition for GoodGovernance		
184	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 23 - Current Projects - Coalition for Good Governance	Deposition Exhibit	104; F; 403; C; NR
185	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 24 - Tweets from January 24, 2021	Deposition Exhibit	104; F; 403; C; NR
186	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 25 - 8/22/20 tweet	Deposition Exhibit	104; F; 403; C; NR
187	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 26 - E-mails, 1/18/18 CGG2021001278172	Deposition Exhibit	F
188	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6)	Deposition Exhibit	F; NE

Exhibit No	Document Description	Document Type	Objections
	Deposition- Deposition Exhibit 27 - Supplemental Response to Rog 12		
189	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 28 - Coalition Plaintiffs' Responses to Defendant Anh Le's First Interrogatories	Deposition Exhibit	F; NE
190	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 29 - Joint Litigation and Common Interest Agreement	Deposition Exhibit	NR; H; F; OW
191	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 30 - Facebook advertisement from Friends of Coalition for Good Governance	Deposition Exhibit	NR; A; H; F; PK
192	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 31 - E-mail regarding ballot	Deposition Exhibit	NR; 403; F; H

Exhibit No	Document Description	Document Type	Objections
	image legislation		
193	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 32 - E- mails, 8/24/21, Subject: Garland's new lawsuit against BMDs	Deposition Exhibit	NR; 403; F
194	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 33 - January 1, 2021 tweet	Deposition Exhibit	403; F
195	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 34 - Coalition for Good Governance's and Coalition Plaintiffs' Objections and Responses to Defendant Brad Raffensperger's First Request for Admission	Deposition Exhibit	NE
196	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition	Deposition Exhibit	A; PK; OW; H; F; 403

Exhibit No	Document Description	Document Type	Objections
	Exhibit 35 - 12.30.2020 GA Senate Judiciary Sub-Committee on Election Law		
197	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 36 - Plaintiff Coalition for Good Governance's Objections and Responses to State Defendants' Second Request for Production of Documents	Deposition Exhibit	NE
198	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 37 - Response of Coalition for Good Governance to Brad Raffensperger's First	Deposition Exhibit	NE
199	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 38 - Handwritten notes	Deposition Exhibit	A; F; H
200	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 1 - Notice of Deposition	Deposition Exhibit	NE; H; F; NR
201	2021.09.28 Deposition of Megan Missett -	Deposition Exhibit	403; 104; F; NR

Exhibit No	Document Description	Document Type	Objections
	Deposition Exhibit 2 - Ms. Missett's Voting Record		
202	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 3 - Declaration of Megan Missett, 10/20/19	Deposition Exhibit	NE; H; F
203	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 4 - Declaration of Megan Missett, 5/21/19	Deposition Exhibit	NE; H; F
204	2022.01.17 Deposition of James Oliver - Deposition Exhibit 1 - Organization Chart	Deposition Exhibit	104; H; F; NR
205	2022.01.17 Deposition of James Oliver - Deposition Exhibit 2 - LinkedIn Profile of James Oliver	Deposition Exhibit	104; H; F; NR
206	2022.01.17 Deposition of James Oliver - Deposition Exhibit 3 - Fortalice Task Order dated 3/11/21	Deposition Exhibit	OW; H; F
207	2022.01.17 Deposition of James Oliver - Deposition Exhibit 4 - Email Chain dated October 2018	Deposition Exhibit	H; F
208	2022.01.17 Deposition of James Oliver - Deposition Exhibit 5 - Email Chain dated August 2016	Deposition Exhibit	H; F;

<b>Exhibit No.</b>	<b>Document Description</b>	<b>Document Type</b>	<b>Objections</b>
209	2022.01.17 Deposition of James Oliver - Deposition Exhibit 6 - 2020 Rule 590-8.3 Attestation	Deposition Exhibit	NE
210	2022.01.17 Deposition of James Oliver - Deposition Exhibit 7 - Email Chain dated April 2019	Deposition Exhibit	H; F; C
211	2022.01.17 Deposition of James Oliver - Deposition Exhibit 8 - Email Chain dated October 2019	Deposition Exhibit	104; H; F; NR
212	2022.01.17 Deposition of James Oliver - Deposition Exhibit 9 - Email Chain dated July 2019	Deposition Exhibit	104; H; F; NR
213	2022.01.17 Deposition of James Oliver - Deposition Exhibit 10 - Email Chain dated April 2019	Deposition Exhibit	104; H; F; NR
214	2022.01.17 Deposition of James Oliver - Deposition Exhibit 11 - Email dated 4/24/19	Deposition Exhibit	H; F
215	2022.01.17 Deposition of James Oliver - Deposition Exhibit 12 - Email Chain dated April 2019	Deposition Exhibit	H; F
216	2022.01.21 Deposition of Dominic Olomo - Deposition Exhibit 1 - Curling	Deposition Exhibit	NE; NR



Exhibit No	Document Description	Document Type	Objections
	Plaintiff's Third Amended Notice of Deposition of Fulton County Defendants		
217	2022.01.21 Deposition of Dominic Olomo - Deposition Exhibit 2 - Email string to Tucker from evans 9/29/20	Deposition Exhibit	H; F
218	2022.01.21 Deposition of Dominic Olomo - Deposition Exhibit 3 - Email to Harvey from Spell-Forlwer 10/27/20	Deposition Exhibit	H;F
219	2022.03.08 Deposition of Donna Price - Exhibit 1 - Notice of Deposition	Deposition Exhibit	NE; H; F; NR
220	2022.03.08 Deposition of Donna Price - Exhibit 2 - Georgians for Verified Voting	Deposition Exhibit	104; H; F; PK; NR
221	2022.03.08 Deposition of Donna Price - Exhibit 3 - Voter History File	Deposition Exhibit	403; F
222	2022.03.08 Deposition of Donna Price - Exhibit 4 - Third Amended Complaint	Deposition Exhibit	NE; H; F
223	2022.03.08 Deposition of Donna Price - Exhibit 6 - Declaration dated 8/17/18	Deposition Exhibit	NE; H; F
224	2022.03.08 Deposition of Donna Price - Exhibit 7 -	Deposition Exhibit	NE; H; F

Exhibit No	Document Description	Document Type	Objections
	Declaration dated 5/29/18		
225	2022.03.08 Deposition of Donna Price - Exhibit 8 - Declaration dated 10/4/19	Deposition Exhibit	NE; H; F
226	2022.03.08 Deposition of Donna Price - Exhibit 10 - Declaration dated 8/19/20	Deposition Exhibit	NE; H; F
227	2022.03.08 Deposition of Donna Price - Exhibit 11 - Declaration dated 2/12/21	Deposition Exhibit	NE; H; F
228	2022.03.08 Deposition of Donna Price - Exhibit 12 - Absentee Ballot Report	Deposition Exhibit	A; F;
229	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 1 - DouglasNow news article, Re: Hampton & Ridlehoover resignation	Deposition Exhibit	H; F; PK; A
230	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 2 - Ridlehoover subpoena	Deposition Exhibit	NE
231	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 3 - Jil Screenshot at 5.19 of Video 2	Deposition Exhibit	A, F, H, OW
232	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 4 - Dominion Voting Machine Flaws -- 2020	Deposition Exhibit	A, F, H,

Exhibit No	Document Description	Document Type	Objections
	Election Coffee County		
233	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 5 - Screenshot 2 (sportcoat)	Deposition Exhibit	F, NR, OW, I
234	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 6 - Screenshot of Scott Hall	Deposition Exhibit	F, NR, OW, I
235	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 7 - Screenshot of Jennifer Jackson	Deposition Exhibit	F, NR, OW, I
236	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 8 - Screenshot of Paul Maggio	Deposition Exhibit	F, NR, OW, I
237	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 9 - Screenshot of Doug Logan	Deposition Exhibit	F, NR, OW, I
238	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 10 - Screenshot of Greg Freemyer	Deposition Exhibit	F, NR, OW, I
239	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 11 - Screenshot of Russ Ramsland	Deposition Exhibit	F, NR, OW, I
240	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 12 - Screenshot of Jeffrey Lenberg	Deposition Exhibit	F, NR, OW, I

Exhibit No	Document Description	Document Type	Objections
241	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 13 - Screenshot 3	Deposition Exhibit	F, NR, OW, I
242	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 14 - Email string from Frances Watson to Pamela Jones, dated May 11, 2021	Deposition Exhibit	F, H,
243	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 15 - Election Database Memo re: Passwords	Deposition Exhibit	F, H,
244	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 16 - Misty Hampton Messages with Eric Chaney	Deposition Exhibit	F, H, I
245	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 17 - Text Messages	Deposition Exhibit	F, H, I
246	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 18 - Texts Reveal GOP Mission to Breach Voting Machine in Georgia - Daily Beast	Deposition Exhibit	F, H
247	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 1 - Notice of Deposition	Deposition Exhibit	H, F, NE, NR
248	2021.10.19 Deposition of Jeffrey Schoenberg -	Deposition Exhibit	H, F, NE

Exhibit No	Document Description	Document Type	Objections
	Exhibit 2 - Verified Complaint		
249	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 3 - Verified Amended Complaint	Deposition Exhibit	H, F, NE
250	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 4 - Second Amended Complaint	Deposition Exhibit	H, F, NE
251	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 5 - Third Amended Complaint	Deposition Exhibit	H, F, NE
252	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 6 - ENET Report	Deposition Exhibit	H, F, NR
253	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 7 - Absentee Ballot Report	Deposition Exhibit	H, F, NR
254	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 8 - " An Update on Georgia's Election Integrity Lawsuit" 10/11/19	Deposition Exhibit	H, F, NR
255	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 9 - "Daniel Blackman Named EC Chair of Sierra Club, Georgia Chapter"	Deposition Exhibit	H, F, NR
256	2021.10.19 Deposition of Jeffrey Schoenberg -	Deposition Exhibit	H, F, NE

Exhibit No	Document Description	Document Type	Objections
	Exhibit 10 - Declaration 8/19/20		
257	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 11 - Declaration 8/7/18	Deposition Exhibit	H, F, NE
258	2021.10.19 Deposition of Jeffrey Schoenberg - Exhibit 12 - Email Chain	Deposition Exhibit	H, F
259	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 73 - Declaration of Michael Shamos	Deposition Exhibit	H, F, NE
260	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 74 - Powerpoint entitled, Cybersecurity Considerations for Voting Systems, Wenke Lee, Ph.D.	Deposition Exhibit	H, F
261	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 75 - Cloudbust Security document entitled, Office of the Georgia Secretary of State Cyber Risk Assessment October 2017	Deposition Exhibit	H, F
262	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 76 - Fortalice document	Deposition Exhibit	H, F

Exhibit No	Document Description	Document Type	Objections
263	2019.07.19 Deposition of Michael Ian Shamos - Plaintiffs Exhibit 77 - Diebold in the News - A Partial List of Documented Failures	Deposition Exhibit	H, F, NP
264	2022.09.28 Deposition of Robert Sinners - Exhibit 1 - LinkedIn Profile	Deposition Exhibit	H, F, NP, I
265	2022.09.28 Deposition of Robert Sinners - Exhibit 2 - 08122022-000034 through 08122022-000053	Deposition Exhibit	H, F, M
266	2022.09.28 Deposition of Robert Sinners - Exhibit 3 - 08122022-000110 through 08122022-000122	Deposition Exhibit	H, F
267	2022.09.28 Deposition of Robert Sinners - Exhibit 4 - 08122022-000162 through 08122022-000174	Deposition Exhibit	H, F
268	2022.09.28 Deposition of Robert Sinners - Exhibit 5 - E- mail thread, Harry MacDougald, dated November 10, 2020	Deposition Exhibit	H, F
269	2022.09.28 Deposition of Robert Sinners - Exhibit 6 - Email thread from Harry MacDougald, dated November 10, 2020	Deposition Exhibit	H, F, M

Exhibit No	Document Description	Document Type	Objections
270	2022.09.28 Deposition of Robert Sinners - Exhibit 7 - Excerpt of Misty Hampton's messages	Deposition Exhibit	H, F, IS, I
271	2022.09.28 Deposition of Robert Sinners - Exhibit 8 - E-mail from Eric Chaney, November 11, 2020	Deposition Exhibit	H, F
272	2022.09.28 Deposition of Robert Sinners - Exhibit 9 - E-mail thread, Tracie Vickers, December 3, 2020	Deposition Exhibit	H, F
273	2022.09.28 Deposition of Robert Sinners - Exhibit 10 - E-mail thread, David Shafer, November 20, 2020	Deposition Exhibit	H, F
274	2022.09.28 Deposition of Robert Sinners - Exhibit 11 - November 11, 2020 letter to Brad Raffensperger	Deposition Exhibit	H, F, I
275	2022.09.28 Deposition of Robert Sinners - Exhibit 12 - Email Thread to Eric Chaney December 8, 2020	Deposition Exhibit	H, F, M
276	2022.09.28 Deposition of Robert Sinners - Exhibit 13 - December 2, 2020, Misty Hampton e-mailing Sinner re: Trump Campaign	Deposition Exhibit	H, F



Exhibit No	Document Description	Document Type	Objections
277	2022.09.28 Deposition of Robert Sinners - Exhibit 14 - December 13, 2020 Sinners text messages with Alex Kaufman	Deposition Exhibit	H, F, IS, I
278	2022.09.28 Deposition of Robert Sinners - Exhibit 15 - Washington Post Article - Fake Trump Electors in Georgia told to Shroud Plans in Secrecy	Deposition Exhibit	H, F, NR
279	2022.09.28 Deposition of Robert Sinners - Exhibit 16 - Germany Declaration	Deposition Exhibit	H, F, NE
280	2022.09.28 Deposition of Robert Sinners - Exhibit 17 - Raffensperger: Coffee County Probe Stalled Because Local Officials Lied	Deposition Exhibit	H, F, C
281	2022.09.28 Deposition of Robert Sinners - Exhibit 18 - Doug Richards Short Version	Deposition Exhibit	H, F, C
282	2022.09.28 Deposition of Robert Sinners - Exhibit 19 - Questions Raised in Timeline of State Response to Coffee County Breach	Deposition Exhibit	H, F, I
283	2022.09.28 Deposition of Robert Sinners - Exhibit 20 - Questions Raised in Timeline of State	Deposition Exhibit	H, F, C

Exhibit No	Document Description	Document Type	Objections
	Response to Coffee County Breach		
284	2022.09.28 Deposition of Robert Sinners - Exhibit 21 - May 7, 2021 Barnes E-mail Chain re Cyber Ninjas	Deposition Exhibit	H, F, C, M
285	2022.09.28 Deposition of Robert Sinners - Exhibit 22 - Excerpt from deposition of Michael Ian Shamos	Deposition Exhibit	H, F, NE, T, I
286	2022.09.28 Deposition of Robert Sinners - Exhibit 23 - MITRE Report	Deposition Exhibit	H, F
287	2022.09.28 Deposition of Robert Sinners - Exhibit 24 - May 20, 2021 Sinners Email to Fuchs	Deposition Exhibit	H, F
288	2022.09.28 Deposition of Robert Sinners - Exhibit 25 - March 3, 2021 Sinners asked to draft more responses	Deposition Exhibit	H, F
289	2022.09.28 Deposition of Robert Sinners - Exhibit 26 - 4/13/22 texts between Sinners and Marshall regarding Sterling Deposition	Deposition Exhibit	H, F, I, IS
290	2022.09.28 Deposition of Robert Sinners - Exhibit 27 - Sinners emails in	Deposition Exhibit	H, F

Exhibit No	Document Description	Document Type	Objections
	response to media requests		
291	2022.09.28 Deposition of Robert Sinners - Exhibit 28 - 2021 Convention Resolutions Committee Report	Deposition Exhibit	H, F, NR
292	2022.09.28 Deposition of Robert Sinners - Exhibit 29 - Text messages between Sinners and Gardner	Deposition Exhibit	H, F, I, IS
293	2022.09.28 Deposition of Robert Sinners - Exhibit 30 - Pictures, SOS Investigator Visit	Deposition Exhibit	M, OW
294	2022.09.28 Deposition of Robert Sinners - Exhibit 31 - Kaufman email to Sinners	Deposition Exhibit	F, H, M, NE
295	2022.09.28 Deposition of Robert Sinners - Exhibit 32 - Affidavit of Alyssa Hope Taylor	Deposition Exhibit	F, H, M, NE
296	2022.09.28 Deposition of Robert Sinners - Exhibit 33 - Presidential Findings to Preserve Collect and Analyze National Security Information Regarding the 2020 General election	Deposition Exhibit	H, F
297	2022.09.28 Deposition of Robert Sinners - Exhibit 34 - Still Lawsuit	Deposition Exhibit	H, F, NE, M

Exhibit No	Document Description	Document Type	Objections
298	2022.09.28 Deposition of Robert Sinners - Exhibit 35 - Shawn Still Motion	Deposition Exhibit	H, F, NE, M
299	2022.09.28 Deposition of Robert Sinners - Exhibit 36 - O.C.G.A. 21-2-524(b) Certificate of Service of Summons, Petition and Discovery	Deposition Exhibit	H, F, NE, M
300	2022.09.28 Deposition of Robert Sinners - Exhibit 37 - Shawn Still e-mail, December 15, 2020	Deposition Exhibit	H, F
301	2022.09.28 Deposition of Robert Sinners - Exhibit 38 - Email from Christina Read, December 10, 2020	Deposition Exhibit	H, F
302	2022.09.28 Deposition of Robert Sinners - Exhibit 39 - Email thread, Christina Norton, January 1, 2021	Deposition Exhibit	H, F
303	2022.12.16 Deposition of Kevin Skoglund - Exhibit 1 - Skoglund Declaration Confidential	Deposition Exhibit	H, F, NE
304	2022.12.16 Deposition of Phillip Stark - Exhibit 1 - Notice of Deposition	Deposition Exhibit	H, F, NE; NR
305	2022.12.16 Deposition of Phillip Stark - Exhibit 2 - Supplemental Report 66	Deposition Exhibit	H, F, NE, M

Exhibit No	Document Description	Document Type	Objections
306	2022.12.16 Deposition of Phillip Stark - Exhibit 3 - Tabulating Results	Deposition Exhibit	H, F,
307	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 1 - Fourt Amended Notice of Deposition	Deposition Exhibit	H, F, NE, NR
308	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 2 - LinkedIn Web Page	Deposition Exhibit	H, F
309	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 3 - Excerpted pages of "Integrity Counts" By Raffensperger	Deposition Exhibit	H, F, I
310	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 4 - Video excerpts of speech by Gabrial Sterling re: Univeriste de geneve function	Deposition Exhibit	H, F, NE, Unknown
311	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 5 - 7/15/19 State Def's objections and reposes to Curling Plaintiffs' First Set of Interrogatories	Deposition Exhibit	H, F, NE
312	2022.02.24 30(b)(6) Deposition of SOS	Deposition Exhibit	H, F, NE, M

Exhibit No	Document Description	Document Type	Objections
	(Gabriel Sterling) - Exhibit 6 - State Defs' Responses and Objections to Curling Plaintiffs' Second Set of Interrogatories		
313	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 7 - State Defendants Responses to First Requests for Admissions	Deposition Exhibit	H, F, NE
314	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 8 - State Defendants 113751	Deposition Exhibit	H, F
315	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 9 - State Defendants 172679 thru 686	Deposition Exhibit	H, F, M
316	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 10 - State Defendants 169353	Deposition Exhibit	H, F
317	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 11 - State Defendants 192602 thru 603.	Deposition Exhibit	H, F
318	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 12 - Audio	Deposition Exhibit	H, F, NE, Unknown

Exhibit No	Document Description	Document Type	Objections
	recording of telephone call.		
319	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 17 - State-Defendants 11151729 thru 781.	Deposition Exhibit	H, F
320	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 18 - Dominion Voting brochure re: Mobile ballot printing.	Deposition Exhibit	PK
321	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 19 - Georgia Code 21-2-498	Deposition Exhibit	NE
322	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 20 - Rule 183-1-15-.04	Deposition Exhibit	F, H, I
323	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 21 - Arlo Document regarding Ballot manifest.	Deposition Exhibit	F, H, I, A
324	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 22 - 11-19-20 - Excel Spreadsheet regarding Arlo Audit report	Deposition Exhibit	H, F, NE, Unknown

Exhibit No	Document Description	Document Type	Objections
325	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 23 - State of Georgia letterhead from Brian Kemp to members of State Election Board regarding 2020 election	Deposition Exhibit	H, F, M
326	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 24 - Audit Board Batch Sheet re: DeKalb Tucker Election Day	Deposition Exhibit	H, F, Q, A
327	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 25 - Audit Board Batch Sheet regarding DeKalb Tucker Library Advance	Deposition Exhibit	H, F, Q, A
328	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 26	Deposition Exhibit	Unknown
329	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 27 - Audit Board Batch Sheet re: DeKalb 2339 Absentee	Deposition Exhibit	H, F, Q, A
330	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 28 - Audit Board Batch Sheet regarding DeKalb 1956 Absentee	Deposition Exhibit	H, F, Q, A



Exhibit No	Document Description	Document Type	Objections
331	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 29 - Audit Board Batch Sheet regarding DeKalb 1836 Absentee	Deposition Exhibit	H, F, Q, A
332	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 30 - Senators Walker and Blackmon to members of the State Election Board regarding 2020 election	Deposition Exhibit	H, F, PK
333	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 31	Deposition Exhibit	Unknown
334	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 32 - Fox5Atlanta Web Page article regarding Software glitch causes delay in counting thousands of votes in Gwinnett County	Deposition Exhibit	H, F
335	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 33 - Whittier Daily News web page article by Conny McCormack - A behind the scenes look at Georgia's vote counting.	Deposition Exhibit	H, F

Exhibit No	Document Description	Document Type	Objections
336	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 1 - Plaintiffs Seventh Amended Notice for Deposition	Deposition Exhibit	H, F, NE, NR
337	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 2 - Report of Investigation of Blanchard	Deposition Exhibit	H, F, PK
338	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 3 - Photograph from Youtube video of post-it with password	Deposition Exhibit	C, OW, I, H, F
339	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 4 - Series of tweets by Sterling responding to Adida's tweet	Deposition Exhibit	H, F, IS, I, M
340	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 5 - 2/10 transcript of Secretary Raffensperger Interview	Deposition Exhibit	H, F, C, PK
341	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 6 - Still photo from the Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022)	Deposition Exhibit	H, F, PK, I
342	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 7 -	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	Email chain ending with 5/11/21 from Watson to Jones		
343	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 8 - Letter from Ellis to Reynolds regarding Request for Assistance in investigation	Deposition Exhibit	F, H
344	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 9 - Email chain from Germany to Ellis regarding Server	Deposition Exhibit	F, H
345	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 10 - Email chain from sterling to Miller regarding Curling v. Raffensperger; 1:17-CV-2989	Deposition Exhibit	F, H
346	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 11 - Email from Germany to ORR administration regarding Open Records Request	Deposition Exhibit	F, H
347	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 12 - UTC Message from hampton to Voyles titled ORR	Deposition Exhibit	F, H
348	2022.10.12 30(b)(6) SOS (Gabriel Sterling) -	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	Exhibit 13 - Email from Germany to Tyson regarding GASOS ORR		
349	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 14 - Email chain from Koth to Ellis Regarding Opern Records Request	Deposition Exhibit	F, H
350	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 15 - Sheet for SEB2020-250-Coffee County Misc	Deposition Exhibit	F, H
351	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 16 - Interior stills taken from video camera 1	Deposition Exhibit	I, OW
352	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 17 - Still shots from video of Coffee County election Board office	Deposition Exhibit	I, OW
353	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 18 - Tweet by Juha regarding Mike Lindell's Plane Flights	Deposition Exhibit	H, F, M, I
354	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 19 - Excel Spreadsheet - IP Addresses that have downloaded CC data	Deposition Exhibit	H, F

Exhibit No	Document Description	Document Type	Objections
355	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 20 - Email chain from Maggio to Federalattorney regarding Coffee County Forensics FedEx request	Deposition Exhibit	H, F
356	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 21 - Email from Brown to Belinfante regarding JSON Format Cast Vote Records on the Internet	Deposition Exhibit	H, F, M
357	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 22 - Email from Johnson to McClain regarding SullivanStrickler / Spalding County Board fo Elections	Deposition Exhibit	H, F, M
358	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 23 - Virtual Videotaped 30(b)(6) Deposition of Sanford Merritt Beaver	Deposition Exhibit	H, F, NE, T
359	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 24 - Rolling Stone Article by Glawe "Pro-Trump Georgia Officials Plotted to Swipe Voting Data. We Caught Them."	Deposition Exhibit	H, F
360	2022.10.12 30(b)(6) SOS (Gabriel Sterling) -	Deposition Exhibit	H, F

Exhibit No	Document Description	Document Type	Objections
	Exhibit 25 - Official Election Bulletin 11/17/20		
361	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 26 - 12/9/20 Press Release from SOS regarding Opening investigation into Coffee County's handling recount	Deposition Exhibit	H, F
362	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 27 - Email from Favorito to Harding regarding Final Ballot inspection plan	Deposition Exhibit	H, F
363	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 28 - 5-5-21 Letter, to The Honorable Karen Fann, President, Arizona State Senate, from Karlan, Civil Rights Division, DOJ	Deposition Exhibit	H, F
364	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 29 - Dominion Voting, Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System	Deposition Exhibit	H, F
365	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 30 - Press Release - MITRE Corporation, an	Deposition Exhibit	H, F, I

Exhibit No	Document Description	Document Type	Objections
	Independent Federal Lab, finds Georgia Election System Secure		
366	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 31 - July 2022 MITRE Document - Independent Technical Review: Security Analysis of Georgia's ImageCast X Ballot Marking Devices	Deposition Exhibit	H, F, I
367	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 32 - E-mail Chain Ending with Wednesday, 8-18-21 12:49 PM E-mail, from Evans, to Johnson, et al., Subject: RE: Spalding County Equipment	Deposition Exhibit	H, F
368	2021.11.05 Deposition of Rebecca Sullivan - Exhibit 1 - 2/28/20 Meeint Minutes of SEB	Deposition Exhibit	H, F
369	2021.11.05 Deposition of Rebecca Sullivan - Exhibit 2 - Transcript from the SEB hearing on 1/22/20	Deposition Exhibit	H, F, NE
370	2021.11.04 Deposition of Matthew Mashburn - Exhibit 1 - Meeting Minutes	Deposition Exhibit	H, F
371	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) -	Deposition Exhibit	C, H, F, NE, M

Exhibit No	Document Description	Document Type	Objections
	Exhibit 1 - Subpeona to testify		
372	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 2 - Picture of Jim Nelson	Deposition Exhibit	C, OW
373	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 3 - Picture of Jennifer Jackson	Deposition Exhibit	C, OW
374	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 4 - Picture of karuna Naik	Deposition Exhibit	C, H, F, OW
375	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 5 - Picture of Paul Maggio	Deposition Exhibit	C, OW
376	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 6 - Engagement Agreement 11/30/20	Deposition Exhibit	C, H, F
377	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 7 - Engagement Agreement, MI, AZ, December 6, 2020	Deposition Exhibit	C, H, F
378	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 8 - January 8, 2021 Maggio email chain invoice	Deposition Exhibit	C, H, F



Exhibit No	Document Description	Document Type	Objections
379	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 9 - Phone text message 8/12/22	Deposition Exhibit	C, H, F, IS, I
380	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 10 - Coffee County Board of Elections and Registration Elections Office Security Video 1/7/21	Deposition Exhibit	C, I, IS, OW
381	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 11 - January 8, 2021 from 5pm to 6pm missing video	Deposition Exhibit	C, I, IS, OW
382	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 12 - Bates numbers 08122022 000236 to 265	Deposition Exhibit	C, I, IS, OW
383	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 13 - Password Memos, 08122022-000123 through 125	Deposition Exhibit	C, H, F, M
384	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 14 - Maggio hard drive contents	Deposition Exhibit	C, H, F, IS
385	2022.09.02 Sullivan Strickler 30(b)(6) (Dean	Deposition Exhibit	C, H, F, IS

Exhibit No	Document Description	Document Type	Objections
	Felicetti) - Exhibit 15 - 8/17/22 Maggio Production Folder Structure		
386	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 16 - Bates Numbers 08122022-000126 through 136	Deposition Exhibit	C, H, F, IS
387	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 17 - 08122022-000137 through 161	Deposition Exhibit	C, H, F, IS
388	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 18 - Bates Numbers 08122022-000175 through 176	Deposition Exhibit	C, H, F
389	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 19 - Bates Numbers 08122022-000098 through 105	Deposition Exhibit	C, H, F, M
390	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 20 - Bates Numbers 08122022-000204 through 205	Deposition Exhibit	C, H, F, M, Unknown
391	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) -	Deposition Exhibit	C, H, F, IS

Exhibit No	Document Description	Document Type	Objections
	Exhibit 21 - Excel Attachment 08122022-000205		
392	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 22 - Bates Numbers 08122022-000022 through 33	Deposition Exhibit	C, H, F
393	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 23 - Maggio-000057 58 Excel	Deposition Exhibit	C, H, F, M, IS
394	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 24 - May 7, 2021 Barnes e-mail chain re: Cyber Ninjas	Deposition Exhibit	C, H, F, M
395	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 25 - subpoena	Deposition Exhibit	C, H, F, NE, I
396	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 26 - STATE-DEFENDANTS-001 01937	Deposition Exhibit	C, H, F
397	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 27 - ICS Advisory Vulnerabilities Affecting Dominion Voting System ImageCast X	Deposition Exhibit	C, H, F
398	2022.09.02 Sullivan Strickler 30(b)(6) (Dean	Deposition Exhibit	C, OW, H, F

Exhibit No	Document Description	Document Type	Objections
	Felicetti) - Exhibit 28 - Copy of Check to Defending the Republic		
399	2022.11.16 Deposition of Blake Voyles - Exhibit 1 - Subpoena	Deposition Exhibit	F, H, M, NE
400	2022.11.16 Deposition of Blake Voyles - Exhibit 2 - Ed Voyles November 2020 Election 23 Office Visits	Deposition Exhibit	F, H, IS
401	2022.11.16 Deposition of Blake Voyles - Exhibit 3 - CGG20220001857 to 858	Deposition Exhibit	H, F
402	2022.11.16 Deposition of Blake Voyles - Exhibit 4 - 1-8- 21 e-mail, Voyles to Holmes	Deposition Exhibit	H, F, M, I
403	2022.11.16 Deposition of Blake Voyles - Exhibit 5 - 11-16- 20 e-mail, Hampton to Voyles	Deposition Exhibit	H, F, M
404	2022.11.16 Deposition of Blake Voyles - Exhibit 6 - 12-16- 20 e-mail, redacted to bemarkdkerik	Deposition Exhibit	H, F, M
405	2022.11.16 Deposition of Blake Voyles - Exhibit 7 - 12-21- 20 e-mail, to Voyles	Deposition Exhibit	H, F, I
406	2022.11.16 Deposition of Blake Voyles - Exhibit 8 - SOS Opens Investigation into Coffee County's Handling recount	Deposition Exhibit	H, F

Exhibit No	Document Description	Document Type	Objections
407	2022.11.16 Deposition of Blake Voyles - Exhibit 9 - CGG20220002034 to 035	Deposition Exhibit	H, F, M
408	2022.11.16 Deposition of Blake Voyles - Exhibit 10 - Photographs	Deposition Exhibit	I, IS, OW
409	2022.11.16 Deposition of Blake Voyles - Exhibit 11 - photographs	Deposition Exhibit	I, IS, OW
410	2022.11.16 Deposition of Blake Voyles - Exhibit 12 - photographs	Deposition Exhibit	I, IS, OW
411	2022.11.16 Deposition of Blake Voyles - Exhibit 13 - Rule 183-1-12-.05	Deposition Exhibit	H, F
412	2022.11.16 Deposition of Blake Voyles - Exhibit 14 - 3-8-21 text message, Voyles to Marks	Deposition Exhibit	H, F, IS, I
413	2022.11.16 Deposition of Blake Voyles - Exhibit 15 - 2-19-21 combined text messages folder	Deposition Exhibit	H, F, IS, I, M
414	2022.11.16 Deposition of Blake Voyles - Exhibit 16 - 12-16-20 e-mail, Voyles to Chaney	Deposition Exhibit	H, F, M
415	2022.11.16 Deposition of Blake Voyles - Exhibit 17 - 1-4-21 text message, Thomas	Deposition Exhibit	H, F, I, IS
416	2022.11.16 Deposition of Blake Voyles - Exhibit 18	Deposition Exhibit	I, OW

Exhibit No	Document Description	Document Type	Objections
	- 1-7-21 2:19 p.m. photographs		
417	2022.11.16 Deposition of Blake Voyles - Exhibit 19 - 12-7-20 10:28 a.m. photographs	Deposition Exhibit	I, OW
418	2022.11.16 Deposition of Blake Voyles - Exhibit 20 - 12-8-20 e-mail, Voyles to Foskey	Deposition Exhibit	H, F, M
419	2022.11.16 Deposition of Blake Voyles - Exhibit 21 - 1-6-21 4:17 p.m. photographs	Deposition Exhibit	I, OW
420	2022.11.16 Deposition of Blake Voyles - Exhibit 22 - 1-8-21 e-mail, Voyles to Holmes	Deposition Exhibit	F, H
421	2022.11.16 Deposition of Blake Voyles - Exhibit 23 - 12-8-20 e-mail, Summers to Voyles	Deposition Exhibit	F, H
422	2022.11.16 Deposition of Blake Voyles - Exhibit 24 - 12-8-20 e-mail, Voyles to Carden	Deposition Exhibit	F, H, M
423	2022.08.31 Deposition of Edward Lindsey - Exhibit 1 - June 15 Proposed Redactions, Halderman Report	Deposition Exhibit	F, H, NE, M
424	2022.08.31 Deposition of Edward Lindsey -	Deposition Exhibit	F, H, NE, T, I

Exhibit No	Document Description	Document Type	Objections
	Exhibit 2 - Excerpt from 10/29/2021 Transcript of Juan Gilbert		
425	2022.08.31 Deposition of Edward Lindsey - Exhibit 3 - State-Defendants- 00202234	Deposition Exhibit	F, H
426	2022.08.31 Deposition of Edward Lindsey - Exhibit 4 - State Defendants 00202239	Deposition Exhibit	F, H
427	2022.08.31 Deposition of Edward Lindsey - Exhibit 5 - Article, "Pro- Trump tech team copied Georgia election data, records show"	Deposition Exhibit	F, H
428	2022.08.31 Deposition of Edward Lindsey - Exhibit 6 - Video clip, Restoring Elections Panel	Deposition Exhibit	H, F, NE, Unknown
429	2022.08.31 Deposition of Edward Lindsey - Exhibit 7 - May 7, 2021 Barnes E- mail Chain re: Cyber Ninjas	Deposition Exhibit	H, F, M, C
430	2022.08.31 Deposition of Edward Lindsey - Exhibit 8 - Excerpt from James A. Barnes, Jr. transcript	Deposition Exhibit	H, F, NE, T, I
431	2022.08.31 Deposition of Edward Lindsey - Exhibit 9 -	Deposition Exhibit	H, F, I, IS

Exhibit No	Document Description	Document Type	Objections
	State Defendants 00205051-53		
432	2022.08.31 Deposition of Edward Lindsey - Exhibit 10 - State Defendants 202613	Deposition Exhibit	F, H, OW
433	2022.11.18 Deposition of Doug Logan - Exhibit 1 - 7/27/22 Ichter Davis Letter	Deposition Exhibit	F, H, M, NE
434	2022.11.18 Deposition of Doug Logan - Exhibit 2 - 4/19/21 Board of Selectment Meeting	Deposition Exhibit	F, H, M
435	2022.11.18 Deposition of Doug Logan - Exhibit 3 - Logan Messaging Thread	Deposition Exhibit	F, H, IS, I
436	2022.11.18 Deposition of Doug Logan - Exhibit 4 - Logan Messaging Thread	Deposition Exhibit	F, H, IS
437	2022.11.18 Deposition of Doug Logan - Exhibit 5 - Data Log	Deposition Exhibit	F, H, OW
438	2022.11.18 Deposition of Doug Logan - Exhibit 6 - SullivanStrickler Log Files	Deposition Exhibit	F, H, OW
439	2022.11.18 Deposition of Doug Logan - Exhibit 7 - Photographs	Deposition Exhibit	OW, I
440	2022.11.18 Deposition of Doug Logan - Exhibit 8 - 1/8/21 Email String From Paul Maggio To Sidney Powell	Deposition Exhibit	F, H



Exhibit No	Document Description	Document Type	Objections
441	2022.11.18 Deposition of Doug Logan - Exhibit 9 - screenshot	Deposition Exhibit	F, H, OW, Q
442	2022.11.18 Deposition of Doug Logan - Exhibit 10 - Coalition Plaintiffs' Response on Brief on Law Enforcement Investigative	Deposition Exhibit	F, H, NE, M
443	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 1 - subpoena	Deposition Exhibit	F, H, NE, M
444	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 2 - Jeffrey Lenberg Declaration October 21, 2022	Deposition Exhibit	F, H
445	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 3 - Logan Signal Messages	Deposition Exhibit	F, H, IS, I
446	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 4 - Harvey Memo on system copies	Deposition Exhibit	F, H
447	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 5 - Coffee County ICC & ICP Reports	Deposition Exhibit	F, H, M, A
448	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 6 - Coffee County and Pierce County Records Request	Deposition Exhibit	F, H, M, A

Exhibit No	Document Description	Document Type	Objections
449	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 7 - Color photograph, Cellebrite kit for copying	Deposition Exhibit	OW, I
450	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 8 - Measuring the desk message	Deposition Exhibit	F, H, I
451	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 9 - Color photograph, Lenberg light ring	Deposition Exhibit	OW, I
452	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 11 - Color photograph, pictures coming	Deposition Exhibit	OW, I
453	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 12 - ICP - Analysis - Updated, Dominion 5.5	Deposition Exhibit	F, H, M
454	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 13 - handwritten notes	Deposition Exhibit	F, H, A
455	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 14 - Thumb drive contents - CCBOE Docs responsive to subpoenas	Deposition Exhibit	F, H, A
456	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 15 - Ben Cotton Signal &	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	Coffee County related emails		
457	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 16 - Moncla Signal Communications Annotated	Deposition Exhibit	F, H, A, M, I
458	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 17 - Lenberg vote stealing attack	Deposition Exhibit	F, H, M
459	2019.07.24 Deposition of Lynn Ledford - Exhibit 1 - Notice of Deposition	Deposition Exhibit	F, H, NE, NR
460	2019.07.24 Deposition of Lynn Ledford - Exhibit 2 - Subpoena	Deposition Exhibit	F, H, NE, M
461	2019.07.24 Deposition of Lynn Ledford - Exhibit 3 - E- mail from Ms. Black 6/21/19 regarding provisional ballots	Deposition Exhibit	F, H, A, M, I
462	2019.07.24 Deposition of Lynn Ledford - Exhibit 4 - Voter Comments and Concerns Forms	Deposition Exhibit	F, H, M
463	2019.07.24 Deposition of Lynn Ledford - Exhibit 5 - Intergovernmental agreement	Deposition Exhibit	F, H, M, 104, NR
464	2019.07.24 Deposition of Lynn Ledford - Exhibit 6 -	Deposition Exhibit	A, F, H, M

Exhibit No	Document Description	Document Type	Objections
	Creating and saving export File in GEMS		
465	2019.07.24 Deposition of Lynn Ledford - Exhibit 7 - OEB	Deposition Exhibit	F, H, M
466	2019.07.24 Deposition of Lynn Ledford - Exhibit 8 - Election Related files	Deposition Exhibit	A, F, H
467	2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018	Deposition Exhibit	F, H
468	2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County March 1, 2016	Deposition Exhibit	F, H
469	2019.07.24 Deposition of Lynn Ledford - Exhibit 11 - E-mail from Mr. Newby 8/23/16	Deposition Exhibit	F, H
470	2019.07.24 Deposition of Lynn Ledford - Exhibit 12 - Declaration	Deposition Exhibit	F, H, NE
471	2019.07.24 Deposition of Lynn Ledford - Exhibit 13 - Declaration	Deposition Exhibit	F, H, NE
472	2019.07.24 Deposition of Lynn Ledford - Exhibit 14 - Declaration	Deposition Exhibit	F, H, NE
473	2019.07.24 Deposition of Lynn Ledford - Exhibit	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	15 - Election Results Report		
474	2019.07.24 Deposition of Lynn Ledford - Exhibit 16 - Election Results Report	Deposition Exhibit	F, H, I
475	2019.07.24 Deposition of Lynn Ledford - Exhibit 17 - Gwinnett County Election Day Manager manual	Deposition Exhibit	F, H, I
476	2019.07.24 Deposition of Lynn Ledford - Exhibit 18 - OEB January 30, 2019	Deposition Exhibit	F, H
477	2019.07.24 Deposition of Lynn Ledford - Exhibit 19 - Ballot Image Report	Deposition Exhibit	A, F, H
478	2021.11.4 Deposition of Anh Le - Exhibit 1 - Minutes	Deposition Exhibit	F, H, NR
479	2022.08.08 Deposition of Cathleen Latham - Exhibit 1 - Subpoena	Deposition Exhibit	F, H, NE, NP
480	2022.08.08 Deposition of Cathleen Latham - Exhibit 2 - Subpoena	Deposition Exhibit	F, H, NE, NP
481	2022.08.08 Deposition of Cathleen Latham - Exhibit 3 - Screenshot from Hampton Video	Deposition Exhibit	A, C, 104, NR
482	2022.08.08 Deposition of Cathleen Latham - Exhibit 4 - Letter dated 12/23/20 re	Deposition Exhibit	F, H, I, NE

Exhibit No	Document Description	Document Type	Objections
	Notice of Obligation to preserve documents related to dominion		
483	2022.08.08 Deposition of Cathleen Latham - Exhibit 5 - Draft executive order dated 12/16/20 from President Trump	Deposition Exhibit	A, F, H
484	2022.08.08 Deposition of Cathleen Latham - Exhibit 6 - iPhone text message string screenshots	Deposition Exhibit	F, H
485	2022.08.23 Deposition of Janice Johnston - Exhibit 1 - Plaintiffs' Identification of Outstanding Discovery Disputes	Deposition Exhibit	NE
486	2022.08.23 Deposition of Janice Johnston - Exhibit 2 - Security Analysis of Georgia's ImageCast X BMDs	Deposition Exhibit	C, F, H
487	2022.08.23 Deposition of Janice Johnston - Exhibit 3 - Excerpt testimony from Videotaped videoconference deposition of Juan Gilbert	Deposition Exhibit	F, H, NE, T, I
488	2022.08.23 Deposition of Janice Johnston - Exhibit 4 - Activity Alert: ICSA-22-XXX-XX Vulnerabilities Affecting	Deposition Exhibit	C, F, H

Exhibit No	Document Description	Document Type	Objections
	Dominion Voting Systems ImageCast X		
489	2022.08.23 Deposition of Janice Johnston - Exhibit 5 - Key Photos from production	Deposition Exhibit	C, M, 104, I, NR
490	2022.08.23 Deposition of Janice Johnston - Exhibit 6 - People who have downloaded CC data	Deposition Exhibit	F, H,
491	2022.08.23 Deposition of Janice Johnston - Exhibit 7 - Declaration of Benjamin R. Cotton	Deposition Exhibit	F, H, NE,
492	2022.08.23 Deposition of Janice Johnston - Exhibit 8 - May 7, 2021 Barnes' E-mail chain re: Cyber Ninjas	Deposition Exhibit	F, H, M
493	2022.08.23 Deposition of Janice Johnston - Exhibit 9 - Excerpt from the deposition of James A. Barnes	Deposition Exhibit	F, H, NE, T, I
494	2022.08.23 Deposition of Janice Johnston - Exhibit 10 - E-mail string, Renewed Letter Petition to State Election Board, dated June 6, 2022, at 10:50 a.m.	Deposition Exhibit	F, H
495	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 1 -	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	October 27, 2021 email chain		
496	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 2 - ICS Advisory, "Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit	C, F, H
497	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 3 - April/May 2021 email chain with attachment	Deposition Exhibit	F, H
498	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 4 - April/May 2021 email chain	Deposition Exhibit	F, H
499	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 5 - Photo of Post-it note	Deposition Exhibit	C, F, H, 104, NR
500	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 6 - May 2021 email chain with attachment	Deposition Exhibit	C, F, H
501	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 7 - Coffee County Board of Elections and Registration Monthly Board Meeting, April 13, 2021, 9:30 AM	Deposition Exhibit	F, H
502	2022.07.20 Deposition of James Barnes, Jr. - Exhibit 8 - Invoice dated 4/13/2021	Deposition Exhibit	F, H, 104, NR



Exhibit No	Document Description	Document Type	Objections
503	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 4 - State-Defendants-00113529 - 113530	Deposition Exhibit	A, F, H
504	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 5 - State-Defendants-00108790 - 00108791	Deposition Exhibit	F, H
505	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 6 - State-Defendants-00110732- 00110734	Deposition Exhibit	F, H
506	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 7 - E-mail string to Brower and others from Cummings, 10/22/2020 State-Defendants-00169113 - 00169114	Deposition Exhibit	F, H
507	2023.01.03 Deposition of Alex Halderman - Exhibit 1 - 12-20-22, State Defendants' Notice to Take the Second Expert Deposition of Alex Halderman	Deposition Exhibit	NE, NR
508	2023.01.03 Deposition of Alex Halderman - Exhibit 2 - Declaration of Alex Halderman Re: The Above-captioned action.	Deposition Exhibit	NE, F, H, M
509	2021.10.21 Deposition of Juan Gilbert - Exhibit 1 -	Deposition Exhibit	NE, F, H

Exhibit No	Document Description	Document Type	Objections
	Declaration of Juan Gilbert		
510	2021.10.21 Deposition of Juan Gilbert - Exhibit 2 - Document Entitled "Georgia Voter Verification Study"	Deposition Exhibit	F, H
511	2021.10.21 Deposition of Juan Gilbert - Exhibit 3 - United States Patent, No. US 11.036,442 B2	Deposition Exhibit	F, H
512	2021.10.21 Deposition of Juan Gilbert - Exhibit 4 - Article entitled "Why computer scientists prefer paper ballots"	Deposition Exhibit	F, H
513	2021.10.21 Deposition of Juan Gilbert - Exhibit 5 - Document labeled "Exhibit A"	Deposition Exhibit	C, F, H
514	2021.10.21 Deposition of Juan Gilbert - Exhibit 6 - E-mail string, top e-mail to Scott Tucker from Michael Barnes	Deposition Exhibit	F, H
515	2021.10.21 Deposition of Juan Gilbert - Exhibit 7 - Twitter page	Deposition Exhibit	F, H
516	2021.10.21 Deposition of Juan Gilbert - Exhibit 8 - Letter to Juan E. Gilbert, Ph.D. from Bryan P. Tyson, dated 11-8-19	Deposition Exhibit	NE, F, H
517	2021.10.21 Deposition of Juan Gilbert - Exhibit 9 -	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	Trial transcript, dated 3-24-09		
518	2021.11.05 Deposition of Sarah Ghazal - Exhibit 1 - Tweet by Sara Ghazal, Dated 2/28/20	Deposition Exhibit	F, H
519	2021.11.05 Deposition of Sarah Ghazal - Exhibit 2 - email chain	Deposition Exhibit	F, H
520	2021.11.05 Deposition of Sarah Ghazal - Exhibit 3 - STATE-DEFENDANTS-00201663 through -1664	Deposition Exhibit	A, F, H
521	2021.11.05 Deposition of Sarah Ghazal - Exhibit 4 - Tweet by Sara Ghazal, Dated 2/28/2020	Deposition Exhibit	F, H
522	2021.11.05 Deposition of Sarah Ghazal - Exhibit 5 - Tweet by Sara Ghazal	Deposition Exhibit	F, H
523	2022.01.18 Deposition of David Hamilton - Exhibit 1 - Email Chain, FORTALICE001200 through -001201	Deposition Exhibit	F, H
524	2022.01.18 Deposition of David Hamilton - Exhibit 2 - LinkedIn Profile of David Hamilton	Deposition Exhibit	F, H
525	2022.01.18 Deposition of David Hamilton - Exhibit 3 - Email Chain dated	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	August 2016, Bates Numbers FORTALICE000002952 through -2953		
526	2022.01.18 Deposition of David Hamilton - Exhibit 4 - Fortalice Red Team Penetration Test and Cyber Risk Assessment Report for State of Georgia, Office of the Secretary of State, November 2018, Bates Numbers Payton 000070 through -000119	Deposition Exhibit	F, H
527	2022.01.18 Deposition of David Hamilton - Exhibit 5 - Declaration of David Hamilton	Deposition Exhibit	F, H, NE
528	2022.01.18 Deposition of David Hamilton - Exhibit 6 - Task order from Fortalice to the Secretary of State's office dated March 11, 2021, Bates Numbers FORTALICE000001 through -2	Deposition Exhibit	F, H
529	2022.01.18 Deposition of David Hamilton - Exhibit 7 - Weekly Updates from Fortalice to the Secretary of State's Office, Bates Numbers FORTALICE002781 through -2788	Deposition Exhibit	A, F, H

Exhibit No	Document Description	Document Type	Objections
530	2022.01.18 Deposition of David Hamilton - Exhibit 8 - Email Chain, Bates Numbers STATE-DEFENDANTS-00126678 through - 126682	Deposition Exhibit	F, H
531	2022.01.18 Deposition of David Hamilton - Exhibit 9 - Email Chain, Bates Numbers STATE-DEFENDANTS-00126696 through - 126698	Deposition Exhibit	F, H
532	2022.01.18 Deposition of David Hamilton - Exhibit 10 - News Article, "UPDATE: Ransomware Attackers Hit Hall County Election Infrastructure, dated October 23, 2020	Deposition Exhibit	F, H
533	2022.01.18 Deposition of David Hamilton - Exhibit 11 - Email Chain, Bates Number STATE-DEFENDANTS-00104972	Deposition Exhibit	F, H
534	2022.01.18 Deposition of David Hamilton - Exhibit 12 - Email Chain, Bates Numbers STATE-DEFENDANTS-00158821 through -158822	Deposition Exhibit	F, H
535	2022.01.18 Deposition of David Hamilton - Exhibit 13 - Election Office	Deposition Exhibit	A, F, H

Exhibit No	Document Description	Document Type	Objections
	Notes, 10 AM 6/15/20 Meeting, Bates Numbers STATE-DEFENDANTS-00158823 through -158825		
536	2022.01.18 Deposition of David Hamilton - Exhibit 14 - Email Chain, Bates Numbers STATE-DEFENDANTS-00171971 through -171973	Deposition Exhibit	F, H
537	2022.01.18 Deposition of David Hamilton - Exhibit 15 - Email Chain, Bates Numbers FORTALICE001209 through -1212	Deposition Exhibit	F, H
538	2022.01.18 Deposition of David Hamilton - Exhibit 16 - Supplemental Declaration of David Hamilton	Deposition Exhibit	F, H, NE
539	2022.01.18 Deposition of David Hamilton - Exhibit 17 - Email Chain, Bates Numbers STATE-DEFENDANTS-00126614 through -126616	Deposition Exhibit	F, H
540	2022.01.18 Deposition of David Hamilton - Exhibit 18 - Email Chain, Bates Numbers FORTALICE001163 through FORTALICE001166	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
541	2022.01.18 Deposition of David Hamilton - Exhibit 19 - Report from Fortalice Solutions dated July 14, 2020, Bates Numbers FORTALICE000625 through -629	Deposition Exhibit	F, H
542	2022.01.18 Deposition of David Hamilton - Exhibit 20 - Email from David Hamilton dated 4/29/2021, Bates Number STATE-DEFENDANTS-00170625	Deposition Exhibit	F, H
543	2022.01.18 Deposition of David Hamilton - Exhibit 21 - Email from Dave Hamilton dated 8/21/2020, Bates Number STATE-DEFENDANTS-00161203	Deposition Exhibit	F, H
544	2022.01.18 Deposition of David Hamilton - Exhibit 22 - Document, Bates Numbers STATE-DEFENDANTS-00161204.xl sx through -161204.xlsx	Deposition Exhibit	A, F, H
545	2022.01.18 Deposition of David Hamilton - Exhibit 23 - Document Titled "2020 Security of the Voter Registration System Artifacts and Attestation Pursuant to Rule 590-8-3-.01" dated December	Deposition Exhibit	F, H, I

Exhibit No	Document Description	Document Type	Objections
	18, 2020, Bates Numbers STATE-DEFENDANTS-00182171 through -00182214		
546	2022.01.18 Deposition of David Hamilton - Exhibit 24 - Email Chain, Bates Numbers STATE-DEFENDANTS-00182118 through -182120	Deposition Exhibit	F, H
547	2022.11.11 Deposition of Misty Hampton - Exhibit 1 - Article, Secretary of State's Office Opens Investigation into Coffee County's Handling Recount	Deposition Exhibit	F, H
548	2022.11.11 Deposition of Misty Hampton - Exhibit 2 - Text string messages, Gary with Dominion	Deposition Exhibit	F, H
549	2022.11.11 Deposition of Misty Hampton - Exhibit 3 - String of text messages with Eric Chaney	Deposition Exhibit	F, H
550	2022.11.11 Deposition of Misty Hampton - Exhibit 4 - String of text messages between Misty Hampton and Eric Chaney	Deposition Exhibit	F, H
551	2022.11.11 Deposition of Misty Hampton - Exhibit 5 -	Deposition Exhibit	A, F, H



Exhibit No	Document Description	Document Type	Objections
	Chart of "Confidential" text messages		
552	2022.11.11 Deposition of Misty Hampton - Exhibit 6 - Messages - Andy Thomas & Ernestine Thomas-Clark and Eric Chaney and Matthew McC and Wendell Stone	Deposition Exhibit	F, H
553	2022.11.11 Deposition of Misty Hampton - Exhibit 7 - E- mail from Misty Hampton to Open Records Request, dated March 31, 2021	Deposition Exhibit	F, H
554	2022.11.11 Deposition of Misty Hampton - Exhibit 8 - Time sheet review	Deposition Exhibit	A, F, H, IS, I
555	2022.11.11 Deposition of Misty Hampton - Exhibit 9 - Text messages from James Dom tech	Deposition Exhibit	F, H
556	2022.11.11 Deposition of Misty Hampton - Exhibit 10 - Misty video production - CCBOE responses to Plaintiffs subpoenas	Deposition Exhibit	F, H
557	2022.11.11 Deposition of Misty Hampton - Exhibit 11 - Lindell lands in Douglas	Deposition Exhibit	F, H,
558	2022.11.11 Deposition of Misty Hampton - Exhibit 12 - Shawn Still Complaint	Deposition Exhibit	NE, A, F, H, IS, M

Exhibit No	Document Description	Document Type	Objections
559	2022.11.11 Deposition of Misty Hampton - Exhibit 13 - Misty Hampton e-mailing Robert Sinners' Personal Email	Deposition Exhibit	F, H
560	2022.11.11 Deposition of Misty Hampton - Exhibit 14 - E- mail from Christina Read, Thursday, December 10, 2020	Deposition Exhibit	F, H
561	2022.11.11 Deposition of Misty Hampton - Exhibit 15 - Misty Hampton e-mails from other county users	Deposition Exhibit	F, H, I
562	2022.11.11 Deposition of Misty Hampton - Exhibit 16 - Photograph of password for 2020 Election	Deposition Exhibit	A
563	2022.11.11 Deposition of Misty Hampton - Exhibit 17 - Photograph, Miles Latham on January 7	Deposition Exhibit	104, F
564	2022.11.11 Deposition of Misty Hampton - Exhibit 18 - Photograph of young man walking to building	Deposition Exhibit	104, F
565	2022.11.11 Deposition of Misty Hampton - Exhibit 19 - Photograph, Alex Cruce, on January 7	Deposition Exhibit	M
566	2022.11.11 Deposition of Misty Hampton - Exhibit 20 -	Deposition Exhibit	104, F

Exhibit No	Document Description	Document Type	Objections
	Photograph of Misty's office, GEMS room		
567	2022.11.11 Deposition of Misty Hampton - Exhibit 21 - Series of photographs	Deposition Exhibit	A, M
568	2022.11.11 Deposition of Misty Hampton - Exhibit 22 - Still shots from DouglasNow YouTube video	Deposition Exhibit	M
569	2022.11.11 Deposition of Misty Hampton - Exhibit 23 - EMS computer password	Deposition Exhibit	A
570	2022.11.11 Deposition of Misty Hampton - Exhibit 24 - Photograph, Coffee County GEMS password	Deposition Exhibit	A, C
571	2022.11.11 Deposition of Misty Hampton - Exhibit 25 - Photograph, (exterior only) Lenberg - January 27, 28, 29	Deposition Exhibit	M
572	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 1 - 1-26-22, Curling Plaintiffs' Second Amended Notice of Deposition	Deposition Exhibit	NE, NR
573	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 2 - LinkedIn profile re: Chris Harvey	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
574	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 3	Deposition Exhibit	F, H
575	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 4 - State Defendants 101460 thru 461, 11-6-20, E-mail string from Chris Harvey to Frances Watson re: Violation.	Deposition Exhibit	F, H
576	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 5 - State Defendants 101471 thru 473, 11-10-20, E-mail string from Chris Harvey to Frances Watson re: Security seals on B.M.D.s.	Deposition Exhibit	F, H
577	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 6 - State Defendants 108321, 10-10-20, E-mail from David Worley to Chris Harvey re: Hall County.	Deposition Exhibit	F, H
578	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 7 - State Defendants 108787 thru 788, 5-28-20, E-mail string from Chris Harvey to George Gray re: Board of Elections.	Deposition Exhibit	F, H
579	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 8 - State Defendants 110230 thru 231, 10-15-	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	20, E-mail string from Carol Heard to Chris Harvey re: Threat assessment.		
580	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 9 - State Defendants 115480 thru 482, 10-30-19, E-mail string from Deb Cox to Chris Harvey re: Encoding a supplemental voter.	Deposition Exhibit	F, H
581	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 10 - State Defendants 117430 thru 431, 2-25-21, E-mail string Chris Harvey from Jordan Fuchs re: Security sensitive FW: Call follow-up.	Deposition Exhibit	F, H
582	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 11 - State Defendants 139190 thru 192, 4-5-19, E-mail string from Kevin Rayburn to Jordan Fuchs re: I bet I can hack your electronic voting machines.	Deposition Exhibit	F, H
583	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 12 - Fortalice 1209 thru 1212, 11-2-20, E-mail string from Chris Furtick to Roy Iversen re: Computer accessed remotely.	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
584	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 13 - Dominion 69648, 9-25-20, Chris Harvey Post to The Buzz re: Very important announcement concerning databases.	Deposition Exhibit	F, H
585	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 14 - Dominion 72216, 10-19-20, E-mail from Scott Tucker to list re: GA advanced voting.	Deposition Exhibit	F, H
586	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 15 - Dominion 73354, 11-8-20, E-mail string from Kay Stimson to Jen Daulby re: Voting issue in Georgia.	Deposition Exhibit	F, H
587	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 16 - Dominion 74766 thru 769, 11-17-20, E-mail string from Chris Harvey to Scott Tucker and David Greenwalt re: Update to firewall rules for Meraki MDM for poll pads, attached.	Deposition Exhibit	F, H, M
588	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 17 - Dominion 74784 thru 785, 11-17-20, E-mail string from Scott Tucker to Chris Harvey re: memory cards	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
589	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 18 - Dominion 76086 thru 088, 1-7-21, E-mail string from Tom Feehan to Blake Evans and Scott Tucker re: We have a problem.	Deposition Exhibit	F, H
590	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 19 - State Defendants 2000997 thru 201000, 7-16-19, E-mail string from Ryan Germany to Brad Raffensperger, Jordan Fuchs and Merritt Beaver re: N.A.S.S. elections committee NormShield press release/score card on State Web site security.	Deposition Exhibit	F, H
591	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 20 - State Defendants 165630 thru 632, 12-31-20, E-mail string from Angelos Keromytis to Jordan Fuchs re: Election machine hack?	Deposition Exhibit	F, H
592	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 1 - O.C.G.A. Section 21-2-379.22 re: Requirements for electronic ballot marking.	Deposition Exhibit	I, A, F, H

Exhibit No	Document Description	Document Type	Objections
593	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 4 - 10-12-20, Reuters color photograph of presidential elections early voting at State Farm Arena.	Deposition Exhibit	A, F, H
594	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 12 - Secure the Vote PowerPoint re: Precinct Layout to Aid with Privacy Training.	Deposition Exhibit	A, F, H
595	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 14 - 12-1-20, State of Georgia Official Election Bulletin from Chris Harvey to County election officials and county registrars re: Preserving ballot images and delivering to Sec. of State.	Deposition Exhibit	F, H
596	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 16 - Rockdale 924, 6-11-20, E-mail from Cynthia Willingham to Scott Tucker, Chris Harvey and Kevin Rayburn re: Additional training needed - tech and regional manager.	Deposition Exhibit	F, H, I
597	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 1 - 6-30-22, Subpoena to	Deposition Exhibit	NE, H, F



Exhibit No	Document Description	Document Type	Objections
	Produce Documents, Information or Objects or to Permit Inspection of Premises in a Civil Action to Eric B. Chaney re: The above-captioned action.		
598	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 2 - 8-5-22, Subpoena to Produce Documents, Information or Objects or to Permit Inspection of Premises in a Civil Action to Eric B. Chaney re: The above-captioned action.	Deposition Exhibit	NE
599	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 3 - 8-14-22, Chaney Response to CGG Subpoena for Production of Documents re: Curling v. Kemp.	Deposition Exhibit	NE
600	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 4 - State Defendants 202100 thru 103, 9- 28-21, State of Georgia Secretary of State, Investigations Division Summary re: Coffee County.	Deposition Exhibit	F, H
601	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 5 -	Deposition Exhibit	C, 104

Exhibit No	Document Description	Document Type	Objections
	Color photograph of computer/keyboard with Post-It note.		
602	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 6 - Latham 24 thru 53, Compilation exhibit re: Coffee County Board of Elections documents.	Deposition Exhibit	F, H, IS, M
603	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 7 - 10-6-20 thru 5-3-22, Coffee County Board of Elections and Registration Regular Monthly Meeting Minutes.	Deposition Exhibit	F, H, M
604	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 8 - 4-12-22, E-mail string from Jennifer Dorminey Herzog to Ryan Germany re: Response to 4-12-22 Emma Brown Washington Post inquiry.	Deposition Exhibit	F, H, I, M
605	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 9 - 3-15-18 thru 3-1-21, text message string between Eric Chaney and Misty Hampton.	Deposition Exhibit	C, F, H

Exhibit No	Document Description	Document Type	Objections
606	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 10 - 8122022-34 thru -53, 1-8-21, E- mail string from Paul Maggio to Sidney Powell re: Jim Penrose-Coffee County GA forensics engagement agreement.	Deposition Exhibit	F, H, M
607	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 11 - 6-3-22, ICS Advisory re: Vulnerabilities affecting Dominion Voting Systems ImageCast X.	Deposition Exhibit	C, F, H
608	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 12 - LinkedIn Web page print-out re: Robert A. Sinners.	Deposition Exhibit	F, H
609	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 13 - 12-12-20, Verified Petition for Emergency Injunctive and Declaratory Relief re: Still v. Raffensperger.	Deposition Exhibit	C, NE, H, F
610	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 1 - 8-25-22 Subpoena to Testify At A Deposition in a Civil Action, Coffee	Deposition Exhibit	C, NE, H, F

Exhibit No	Document Description	Document Type	Objections
	County Board of Elections & Registration		
611	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 2 - 1-7-21 and 1-8-21 -- Three Screen Shots From Video of Two Men Entering Office Carrying/Pulling Items	Deposition Exhibit	I, OW, M
612	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 3 - Screen Shots from Camera 1 1-7-21	Deposition Exhibit	M, I, OW
613	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 4 - E-mail Chain Ending with Tuesday, May 11, 2021 3:30 PM E-mail, from Watson, to Jones, Subject: Fwd: Coffee County	Deposition Exhibit	C, F, H
614	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 5 - 5-6-21 Dominion Voting, Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System, CONFIDENTIAL,	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	STATE-DEFENDANTS-00101937		
615	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 6 - A Series of Photographs Showing Compact Flash Cards with Handwritten Tags, Flash Drives, Etc., 08122022-000236-265	Deposition Exhibit	C, 104, IS, M
616	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 7 - Screen Shots from Camera 1 on 1-27-21 Through 1-29-21	Deposition Exhibit	C, 104, IS, OW, I
617	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 8 - 1-28-21 and 1-29-21 Screen Shots of Individuals Entering and Leaving the Elections Office	Deposition Exhibit	C, 104, IS, OW, I
618	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 9 - Two Photographs of Jeffrey Lenberg	Deposition Exhibit	C, 104, IS, OW, I

Exhibit No	Document Description	Document Type	Objections
619	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 10 - Composite Exhibit of Coffee County Board of Elections and Registration Board Meeting Minutes Beginning with 10-6-20	Deposition Exhibit	F, H, M
620	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 11 - 8/12/22 12:20 PM (GMT-05:00) E-mail, from Chaney, to Thomas-Clark, et al., Subject: Coffee Co Board of Elections	Deposition Exhibit	F, H
621	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 12 - Typewritten Sheet Beginning: 3.4.22 (3) All documents, including communications...; E-mail Chain Ending with Tuesday, 4- 12-20 3:50 PM E-mail, from Herzog, to Germany, Subject: FW: Response to 4/12/22 Emma Brown Washington Post inquiry	Deposition Exhibit	A, C, F, H, M, I
622	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 13 -	Deposition Exhibit	C, 104, IS, OW

Exhibit No	Document Description	Document Type	Objections
	Photograph of Voyles and Eric Chaney Sitting at a Table with Laptop in Elections Office		
623	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 14 - Messages - Eric Chaney (With Hampton) Beginning 3/15/18 7:40 PM	Deposition Exhibit	C, F, H, I, IS
624	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 15 - Messages - Andy Thomas & Ernestine Thomas-Clark & Eric Chaney & Matthew McC & Wendell Stone, Beginning with 1-4-12 7:21 PM Text	Deposition Exhibit	F, H
625	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 16 - 2-25-21 Resignation Letter, from Ridlehoover, to Board of Elections Chairperson	Deposition Exhibit	F, H, IS, M
626	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 17 - 2-25-21 Resignation Letter, from Hampton, to Board of Elections Chairperson	Deposition Exhibit	F, H, IS, M

Exhibit No	Document Description	Document Type	Objections
627	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 18 - Juha, Keskinen (@MacFinn44), TWITTER (Feb. 26, 2021, 6:05 PM) Twitter Post	Deposition Exhibit	C, F, H
628	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 19 - Text Message Between Hampton and Rowell (Withdrawn to Attorney-Client Privilege)	Deposition Exhibit	F, H, Unknown
629	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 20 - Message # 249 - From Vickers, to Hampton, Subject: FW [EXTERNAL]Re: Open Records Request	Deposition Exhibit	F, H
630	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 21 - Summary, Dyanna Hours Claimed Period 11-16-20 - 2-19-21	Deposition Exhibit	F, H, IS, M
631	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 22 -	Deposition Exhibit	M



Exhibit No	Document Description	Document Type	Objections
	Screen Shots from Camera 1 1-8-21 Man Leaving with Equipment		
632	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 23 - E-mail Chain Ending with Thursday, 7-15-21 1:57 PM E-mail, from Hampton, to Vickers, Subject: Re: Open Records Request	Deposition Exhibit	F, H
633	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 24 - 4-12-22 Letter, to Marks, from Herzog, Consolidation of Outstanding Open Records Requests	Deposition Exhibit	F, H, I
634	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 25 - 1-8-21 3:48:30 PM E-mail, from Maggio, to Powell, Subject: RE: SSA1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement, 08122022-000034 - 53	Deposition Exhibit	C, F, H, M
635	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 26 - 11-30-20	Deposition Exhibit	F, H

Exhibit No	Document Description	Document Type	Objections
	SullivanStrickler Engagement Agreement Forensic Analysis, 08122022-000110 - 122		
636	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 27 - SSA1722 HARD DRIVE CONTENTS	Deposition Exhibit	F, H, 104, IS
637	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 28 - Spreadsheet of E-mail Addresses with Access to Coffee County Data, 08122022- 000126-136	Deposition Exhibit	C, F, H, 104,
638	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 29 - Spreadsheet of IP Addresses That Have Downloaded Coffee County Data, 08122022-000137-161	Deposition Exhibit	F, H, 104
639	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 30 - CISA - ICS Advisory (ICSA-22-154-01) Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit	C, F, H

Exhibit No	Document Description	Document Type	Objections
640	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Plaintiff's Exhibit 31 - 12-17-20 Still v. Raffensperger Lawsuit, Verified Petition for Emergency Injunctive and Declaratory Relief	Deposition Exhibit	C, M, NE, IS, F, H
641	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Defendants' Exhibit 1 - Ga Comp. R. & Regs. 183- 1-12-.04, 183-1-12-.04. Storage, Maintenance, and Transport of Statewide Voting System Components	Deposition Exhibit	H, F, NE
642	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Defendants' Exhibit 2 - 1-7-21 Screen Shots of Men Entering Front Door of Elections Office with Equipment	Deposition Exhibit	104, OW, I
643	2022.09.01 Coffee County 30(b)(6) Deposition (Wendell Stone) - Defendants' Exhibit 3 - E-mail Chain Ending with Friday, May 7, 2021 1:51:10 PM E-mail, from Germany, to Feehan, et al., Subject: RE: [EXTERNAL] RE:	Deposition Exhibit	F, H, I

Exhibit No	Document Description	Document Type	Objections
	Dominion notice to Customers re: Chain of Custody, Ending Dominion 089394		
644	9.29.2021 Deposition of Ricardo Davis - Exhibit 1 - Notice of Deposition	Deposition Exhibit	NE, NR
645	9.29.2021 Deposition of Ricardo Davis - Exhibit 2 - Declaration Filed 10/23/19	Deposition Exhibit	F, H, NE
646	9.29.2021 Deposition of Ricardo Davis - Exhibit 3 - Mr. Davis voting record	Deposition Exhibit	F, H
647	9.23.2021 Deposition of Laura Digges - Exhibit 1 - Notice of Deposition	Deposition Exhibit	NE, NR
648	9.23.2021 Deposition of Laura Digges - Exhibit 2 - CBS46 News article	Deposition Exhibit	F, H
649	9.23.2021 Deposition of Laura Digges - Exhibit 3 - CGG's and Coalition's Objections and Responses to Raffensperger's First Req. for Admissions	Deposition Exhibit	NE, F, H
650	9.23.2021 Deposition of Laura Digges - Exhibit 4 - ENET Report	Deposition Exhibit	F, H
651	9.23.2021 Deposition of William Digges III - Exhibit 1 - Notice of Deposition	Deposition Exhibit	NE, NR

Exhibit No	Document Description	Document Type	Objections
652	9.23.2021 Deposition of William Digges III - Exhibit 2 - ENET Report	Deposition Exhibit	F, H
653	9.23.2021 Deposition of William Digges III - Exhibit 3 - Coalition Statement on William Diggs	Deposition Exhibit	F, H, M, NE
654	9.23.2021 Deposition of William Digges III - Exhibit 4 - Declaration of William Diggs, III dated October 20, 2019	Deposition Exhibit	F, H, NE
655	9.23.2021 Deposition of William Digges III - Exhibit 5 - Bullet Point Sheet	Deposition Exhibit	F, H, NE
656	6.28.2019 Deposition of Jennifer Doran - Exhibit 32 - Subpoena	Deposition Exhibit	NE, M
657	6.28.2019 Deposition of Jennifer Doran - Exhibit 33 - Direct Record Electronic Voting Machine Recap	Deposition Exhibit	F, H, IS
658	6.28.2019 Deposition of Jennifer Doran - Exhibit 34 - Ballot Image Report	Deposition Exhibit	A, F, H
659	6.28.2019 Deposition of Jennifer Doran - Exhibit 35 - Official Election Bulletin	Deposition Exhibit	F, H
660	6.28.2019 Deposition of Jennifer Doran - Exhibit 36 - 11.26.2018 General	Deposition Exhibit	H, F

Exhibit No	Document Description	Document Type	Objections
	Election Undervote Information		
661	6.28.2019 Deposition of Jennifer Doran - Exhibit 37 - Rockdale County Board of Election Voting Equipment Issues	Deposition Exhibit	H, F
662	9.22.2022 Deposition of Dean Felicetti - Exhibit 1 - Subpoena to Testify at a Civil Action	Deposition Exhibit	C, H, F, NE, M
663	9.22.2022 Deposition of Dean Felicetti - Exhibit 2 - Picture of Jim Nelson, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit	C, OW
664	9.22.2022 Deposition of Dean Felicetti - Exhibit 3 - Picture of Jennifer Jackson, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit	C, OW
665	9.22.2022 Deposition of Dean Felicetti - Exhibit 4 - Picture of Karuna Naik, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit	C, H, F, OW
666	9.22.2022 Deposition of Dean Felicetti - Exhibit 5 - Picture of Paul Maggio, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit	C, OW
667	9.22.2022 Deposition of Dean Felicetti - Exhibit 6	Deposition Exhibit	C, H, F

Exhibit No	Document Description	Document Type	Objections
	- Engagement Agreement, November 30, 2020		
668	9.22.2022 Deposition of Dean Felicetti - Exhibit 7 - Engagement Agreement, MI AZ, December 6, 2020	Deposition Exhibit	C, H, F
669	9.22.2022 Deposition of Dean Felicetti - Exhibit 8 - January 8, 2021 Maggio email chain invoice	Deposition Exhibit	C, H, F
670	9.22.2022 Deposition of Dean Felicetti - Exhibit 9 - Phone text message, 8.12.2022	Deposition Exhibit	C, H, F, IS, I
671	9.22.2022 Deposition of Dean Felicetti - Exhibit 10 - Coffee County Board of Educations and Registration Elections Office Security Video, 1.7.2021	Deposition Exhibit	C, I, IS, OW
672	9.22.2022 Deposition of Dean Felicetti - Exhibit 11 - January 8, 2021 From 5pm to 6pm missing video	Deposition Exhibit	C, I, IS, OW
673	9.22.2022 Deposition of Dean Felicetti - Exhibit 12 - Bates Numbers 08122022 to 265	Deposition Exhibit	C, I, IS, OW
674	9.22.2022 Deposition of Dean Felicetti - Exhibit 13 -	Deposition Exhibit	C, H, F, M

Exhibit No	Document Description	Document Type	Objections
	Password Memos, 08122022 - 000123 through 125		
675	9.22.2022 Deposition of Dean Felicetti - Exhibit 14 - Maggio hard drive contents (screenshots)	Deposition Exhibit	C, H, F, IS
676	9.22.2022 Deposition of Dean Felicetti - Exhibit 15 - 8.17.2022 Maggio Production (Triage reports) Folder Structure	Deposition Exhibit	C, H, F, IS
677	9.22.2022 Deposition of Dean Felicetti - Exhibit 16 - Bates No.s 08122022-000126 through 136	Deposition Exhibit	C, H, F, IS
678	9.22.2022 Deposition of Dean Felicetti - Exhibit 17 - Bates No.s 08122022-000137 through 161	Deposition Exhibit	C, H, F, IS
679	9.22.2022 Deposition of Dean Felicetti - Exhibit 18 - Bates No.s 08122022-000175 through 176	Deposition Exhibit	C, H, F
680	9.22.2022 Deposition of Dean Felicetti - Exhibit 19 - Bates No.s 08122022-000098 through 105	Deposition Exhibit	C, H, F, M
681	9.22.2022 Deposition of Dean Felicetti - Exhibit 20 - Bates No.s 08122022-000204 through 205	Deposition Exhibit	C, H, F, M, Unknown



Exhibit No	Document Description	Document Type	Objections
682	9.22.2022 Deposition of Dean Felicetti - Exhibit 21 - Bates No.s 08122022-000205.XLSX	Deposition Exhibit	C, H, F, IS
683	9.22.2022 Deposition of Dean Felicetti - Exhibit 22 - Bates No.s 08122022-000022 through 33	Deposition Exhibit	C, H, F
684	9.22.2022 Deposition of Dean Felicetti - Exhibit 23 - Maggio-000057 58 Excel	Deposition Exhibit	C, H, F, M, IS
685	9.22.2022 Deposition of Dean Felicetti - Exhibit 24 May 7, 2021 Barnes e-mail chain re: Cyber Ninjas	Deposition Exhibit	C, H, F, M
686	9.22.2022 Deposition of Dean Felicetti - Exhibit 25 - Subpoena	Deposition Exhibit	C, H, F, NE, I
687	9.22.2022 Deposition of Dean Felicetti - Exhibit 26 State Defendants-001 01937	Deposition Exhibit	C, H, F
688	9.22.2022 Deposition of Dean Felicetti - Exhibit 27 - ICS Advisory (ICSA-22-154-01) Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit	C, H, F
689	9.22.2022 Deposition of Dean Felicetti - Exhibit 28 Copy of Check to Defendant the Republic	Deposition Exhibit	C, OW, H, F

Exhibit No	Document Description	Document Type	Objections
690	2022.11.22 Deposition of Alex Cruce - Exhibit 1 - Subpoena		NE, H, F
691	2022.11.22 Deposition of Alex Cruce - Exhibit 2 - Email with Slogs from Misty Hampton, dated January 7, 2021		F, H, I
692	2022.11.22 Deposition of Alex Cruce - Exhibit 3 - Color photographs		M, IS
693	2022.11.22 Deposition of Alex Cruce - Exhibit 4 - Binnall Maggio Engagement Letter		H, F
694	2022.11.22 Deposition of Alex Cruce - Exhibit 5 - Washington Post Inquiry		H, F
695	2022.11.22 Deposition of Alex Cruce - Exhibit 6 - Recording Transcript		H, F
696	2022.11.22 Deposition of Alex Cruce - Exhibit 7 - OCR Additional Documents		H, F, M
697	2022.01.19 Deposition of Donna Curling - Exhibit 1 - Amended Notice of Deposition		NE, H, F, NR
698	2022.01.19 Deposition of Donna Curling - Exhibit 3 - Declaration of Donna Curling in Support of Curling Plaintiffs'		H, F, NE

Exhibit No	Document Description	Document Type	Objections
	Motion for Preliminary Injunction		
699	2022.01.19 Deposition of Donna Curling - Exhibit 7 - Verified Complaint for Declaratory Relief, Injunctive Relief, and Writ of Mandamus		H, F, NE
700	2022.01.19 Deposition of Donna Curling - Exhibit 8 - Third Amended Complaint		H, F, NE
701	2022.01.19 Deposition of Donna Curling - Exhibit 9 - Email Chain (CURLING-0006817 - 0006818)		
702	2022.01.19 Deposition of Donna Curling - Exhibit 10 - Email Chain (CURLING-0010237 - 0010239)		
703	2022.01.19 Deposition of Donna Curling - Exhibit 11 - Email chain (CURLING-0010015 - 0010023)		H, F
704	2022.01.19 Deposition of Donna Curling - Exhibit 12 - Email chain (CURLING-0010166 - 0010180)		H, F
705	2022.01.19 Deposition of Donna Curling - Exhibit 14 - Curling Plaintiffs' Responses and Objections to Ahn Le's		NE

Exhibit No	Document Description	Document Type	Objections
	First Interrogatories to Donna Curling, Donna Price, and Jeffrey Schoenberg		
706	2022.01.19 Deposition of Donna Curling - Exhibit 15 - Curling Plaintiffs' Responses to Defendant Brad Raffensperger's First Requests For Admission		NE
707	2022.01.19 Deposition of Donna Curling - Exhibit 16 - Declaration of Donna P. Curling in Support of Motion for Preliminary Injunction		NE
708	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 1 - Linked In Profile of Ben Cotton		H, F
709	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 2 - Letter from Andrew Parker to Mary Kaiser, and others, dated 8.24.2022		H, F, NE
710	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 3 - Letter from Andrew Parker to Mary Kaiser dated 8.19.2022		H, F
711	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 4 - Article entitled: Pro-Trump Tech		H, F

Exhibit No	Document Description	Document Type	Objections
	Team Copied Georgia Election Data, Records Show		
712	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 5 - 1.8.2021 Paul Maggio email chain and invoice		H, F
713	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 6 - Key Photos from Maggio Production		M
714	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 7 - 8.12.2022 Maggio Hard Drive Contents		F, A, H
715	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 8 - 8.12.2022 Email addresses with access to CC data		F, A, H
716	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 9 - 4.22.2021 Email, Greg Freemyer - no involvement		H, F
717	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 10 - Email chain, Coffee County Forensics FedEx to Lambert		M, H, F
718	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 11 - Cotton Excerpt, 7.21.2022		NE, H, F

Exhibit No	Document Description	Document Type	Objections
	Motion Hearing, Lake v. Hobbs		
719	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 12 - Declaration of Benjamin R, Cotton in Lake v. Hobbs		NE, H, F
720	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 13 - 5.7.2021 Barnes email chain re: Cyber Ninjas		H, F
721	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 14 - Georgia, Secretatary of State, News and Announcements, 1.27.2022		H, F,
722	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 15 - ICS Advisory (ICSA-22-154-01) 6.4.22, 3:21 p.m.		H, F
723	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit 16 - 7.13.2021 Corrected Exhibit B - 7.12 Declaration of J. Alex Halderman		H, F, NE
724	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit D1 - Exhibit D to Cotton First Declaration - EAC Inv Report Williamson County, TN		H, F

Exhibit No	Document Description	Document Type	Objections
725	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit D2 - Exhibit F to Cotton's First Declaration - Halderman Dec. 2020.08.19		H, F, NE
726	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit D3 - Exhibit G to Cotton First Declaration - Halderman Rebuttal Declaration		H, F, NE
727	State Defendants' Statement of Undisputed Material Facts Exhibit 1 - AJC Article: High-Tech Voting Due November	State Defendants' Statement of Undisputed Material Facts	H, F
728	State Defendants' Statement of Undisputed Material Facts Exhibit 2 - The National Academies Press: Securing the Vote Protecting American Democracy	State Defendants' Statement of Undisputed Material Facts	H, F
729	State Defendants' Statement of Undisputed Material Facts Exhibit 3 - Declaration of Ryan Germany	State Defendants' Statement of Undisputed Material Facts	H, F, NE
730	State Defendants' Statement of Undisputed Material Facts Exhibit 4 - Declaration of Dr. Eric Coomer	State Defendants' Statement of Undisputed Material Facts	H, F, NE

<b>Exhibit No</b>	<b>Document Description</b>	<b>Document Type</b>	<b>Objections</b>
731	State Defendants' Statement of Undisputed Material Facts Exhibit 5 - Declaration of Dr. Juan Gilbert	State Defendants' Statement of Undisputed Material Facts	H, F, NE
732	State Defendants' Statement of Undisputed Material Facts Exhibit 6 - SOS DRE Decertification Order	State Defendants' Statement of Undisputed Material Facts	
733	State Defendants' Statement of Undisputed Material Facts Exhibit 7 - Coalition Pltfs Motion to Sever	State Defendants' Statement of Undisputed Material Facts	NE
734	State Defendants' Statement of Undisputed Material Facts Exhibit 8 - Coalition Pltfs Motion to Sever Brief ISO	State Defendants' Statement of Undisputed Material Facts	NE
735	State Defendants' Statement of Undisputed Material Facts Exhibit 9 - Curling Pltfs Notice of Joinder in Coalition's Motion to Sever	State Defendants' Statement of Undisputed Material Facts	NE
736	State Defendants' Statement of Undisputed Material Facts Exhibit 10 - Curling Pltfs Reply in Support of Motion to Sever	State Defendants' Statement of Undisputed Material Facts	NE
737	State Defendants' Statement of Undisputed Material Facts Exhibit 11 - Hearing Transcript for 11/19/21	State Defendants' Statement of Undisputed Material Facts	NE, H, F



<b>Exhibit No</b>	<b>Document Description</b>	<b>Document Type</b>	<b>Objections</b>
738	State Defendants' Statement of Undisputed Material Facts Exhibit 12 - Declaration of Mark Riccobono	State Defendants' Statement of Undisputed Material Facts	NE, H, F
739	State Defendants' Statement of Undisputed Material Facts Exhibit 13 - Deposition Transcript of Teresa Lynn Ledford	State Defendants' Statement of Undisputed Material Facts	NE, T, H, F
740	State Defendants' Statement of Undisputed Material Facts Exhibit 14 - Hearing Transcript for 7/26/19	State Defendants' Statement of Undisputed Material Facts	NE, H, F
741	State Defendants' Statement of Undisputed Material Facts Exhibit 15 - Declaration of Chris Harvey	State Defendants' Statement of Undisputed Material Facts	NE, H, F
742	State Defendants' Statement of Undisputed Material Facts Exhibit 16 - Deposition Transcript of Donna Curling (1/19/22)	State Defendants' Statement of Undisputed Material Facts	NE, H, F, T
743	State Defendants' Statement of Undisputed Material Facts Exhibit 17 - Curling Amended Complaint	State Defendants' Statement of Undisputed Material Facts	NE
744	State Defendants' Statement of Undisputed Material Facts Exhibit 18 - Donna Curling ENET Report	State Defendants' Statement of Undisputed Material Facts	F, H, A

Exhibit No	Document Description	Document Type	Objections
745	State Defendants' Statement of Undisputed Material Facts Exhibit 19 - Donna Curling email from 10/20/20	State Defendants' Statement of Undisputed Material Facts	C,
746	State Defendants' Statement of Undisputed Material Facts Exhibit 20 - Deposition Transcript of Donna Price (3/8/22)	State Defendants' Statement of Undisputed Material Facts	NE, H, F, T
747	State Defendants' Statement of Undisputed Material Facts Exhibit 21 - Donna Price ENET Report	State Defendants' Statement of Undisputed Material Facts	F, H, A
748	State Defendants' Statement of Undisputed Material Facts Exhibit 22 - Deposition Transcript of Jeffrey Schoenberg (10/19/21)	State Defendants' Statement of Undisputed Material Facts	NE, H, F, T
749	State Defendants' Statement of Undisputed Material Facts Exhibit 23 - Jeffrey Schoenberg ENET Report	State Defendants' Statement of Undisputed Material Facts	F, H, A
750	State Defendants' Statement of Undisputed Material Facts Exhibit 24 - Jeffrey Schoenberg Absentee ENET Report	State Defendants' Statement of Undisputed Material Facts	F, H, A
751	State Defendants' Statement of Undisputed Material Facts Exhibit 25 - CGG 30(b)(6) Deposition Transcript	State Defendants' Statement of Undisputed Material Facts	NE, H, F, T

Exhibit No	Document Description	Document Type	Objections
752	State Defendants' Statement of Undisputed Material Facts Exhibit 26 - Coalition Third Amended Complaint	State Defendants' Statement of Undisputed Material Facts	NE, H, F
753	State Defendants' Statement of Undisputed Material Facts Exhibit 27 - Coalition Brief in Support of Motion for PI	State Defendants' Statement of Undisputed Material Facts	NE, H, F
754	State Defendants' Statement of Undisputed Material Facts Exhibit 28 - Deposition Transcript of Laura Digges	State Defendants' Statement of Undisputed Material Facts	NE, H, F, T
755	State Defendants' Statement of Undisputed Material Facts Exhibit 29 - Laura Digges ENET Report	State Defendants' Statement of Undisputed Material Facts	F, H, A
756	State Defendants' Statement of Undisputed Material Facts Exhibit 30 - Deposition Transcript of William Digges III	State Defendants' Statement of Undisputed Material Facts	NE, H, F, T
757	State Defendants' Statement of Undisputed Material Facts Exhibit 31 - Coalition Pltfs Statement on William Digges	State Defendants' Statement of Undisputed Material Facts	NE
758	State Defendants' Statement of Undisputed Material Facts Exhibit 32 - William Digges III ENET Report	State Defendants' Statement of Undisputed Material Facts	F, H, A

Exhibit No	Document Description	Document Type	Objections
759	State Defendants' Statement of Undisputed Material Facts Exhibit 33 - Deposition Transcript of Ricardo Davis	State Defendants' Statement of Undisputed Material Facts	NE, H, F, T
760	State Defendants' Statement of Undisputed Material Facts Exhibit 34 - Ricardo Davis ENET Report	State Defendants' Statement of Undisputed Material Facts	F, H, A
761	State Defendants' Statement of Undisputed Material Facts Exhibit 35 - Deposition Transcript of Megan Missett	State Defendants' Statement of Undisputed Material Facts	NE, H, F, T
762	State Defendants' Statement of Undisputed Material Facts Exhibit 36 - Megan Missett ENET Report	State Defendants' Statement of Undisputed Material Facts	F, H, A
763	State Defendants' Statement of Undisputed Material Facts Exhibit 37 - The Georgia Risk-Limiting Audit/Hand Tally: A Carter Center Observation Report	State Defendants' Statement of Undisputed Material Facts	F, H, A
764	State Defendants' Statement of Undisputed Material Facts Exhibit 38 - The Carter Center Preliminary Statement on Georgia's November 2022 Risk-Limiting Audit Process	State Defendants' Statement of Undisputed Material Facts	F, H, A

Exhibit No	Document Description	Document Type	Objections
765	State Defendants' Statement of Undisputed Material Facts Exhibit 39 - SOS Risk-Limiting Audit Report	State Defendants' Statement of Undisputed Material Facts	F, H, A
766	State Defendants' Statement of Undisputed Material Facts Exhibit 40 - Curling Plaintiffs' Responses to Defendant Brad Raffensperge's First RFA	State Defendants' Statement of Undisputed Material Facts	NE
767	State Defendants' Statement of Undisputed Material Facts Exhibit 41 - MITRE Report	State Defendants' Statement of Undisputed Material Facts	NP, H, NR, 403, A, F
768	State Defendants' Statement of Undisputed Material Facts Exhibit 42 - Declaration of Phillip Stark (3/9/22)	State Defendants' Statement of Undisputed Material Facts	H, F, NE
769	State Defendants' Statement of Undisputed Material Facts Exhibit 43 - Phillip Stark Resignation Letter	State Defendants' Statement of Undisputed Material Facts	NR, H, F
770	State Defendants' Statement of Undisputed Material Facts Exhibit 44 - Declaration of Phillip Stark (12/5/22)	State Defendants' Statement of Undisputed Material Facts	H, F, NE
771	State Defendants' Statement of Undisputed Material Facts Exhibit 45 - Deposition Transcript of Dr. Phillip Stark	State Defendants' Statement of Undisputed Material Facts	H, F, NE, T

<b>Exhibit No</b>	<b>Document Description</b>	<b>Document Type</b>	<b>Objections</b>
772	State Defendants' Statement of Undisputed Material Facts Exhibit 46 - CURLING-0010015-0010023	State Defendants' Statement of Undisputed Material Facts	H, F,
773	State Defendants' Statement of Undisputed Material Facts Exhibit 47 - CURLING-0010127-0010135	State Defendants' Statement of Undisputed Material Facts	H, F
774	State Defendants' Statement of Undisputed Material Facts Exhibit 48 - CURLING-0010142-0010152	State Defendants' Statement of Undisputed Material Facts	H, F
775	State Defendants' Statement of Undisputed Material Facts Exhibit 49 - CURLING-0010153-0010165	State Defendants' Statement of Undisputed Material Facts	H, F
776	State Defendants' Statement of Undisputed Material Facts Exhibit 50 - CURLING-0010166-0010180	State Defendants' Statement of Undisputed Material Facts	H, F
777	State Defendants' Statement of Undisputed Material Facts Exhibit 51 - CURLING-0010181-0010184	State Defendants' Statement of Undisputed Material Facts	H, F
778	State Defendants' Statement of Undisputed Material Facts Exhibit 52 - Auditing Indian Elections Article	State Defendants' Statement of Undisputed Material Facts	H, F
779	State Defendants' Statement of Undisputed Material Facts	State Defendants' Statement of Undisputed Material Facts	H, F, NE

Exhibit No	Document Description	Document Type	Objections
	Exhibit 53 - PI Hearing Transcript (9/10/20)		
780	State Defendants' Statement of Undisputed Material Facts Exhibit 54 - Securing the Vote: Protecting American Democracy	State Defendants' Statement of Undisputed Material Facts	H, F
781	State Defendants' Statement of Undisputed Material Facts Exhibit 55 - Third Supplemental Declaration of Philip Stark	State Defendants' Statement of Undisputed Material Facts	H, F, NE
782	State Defendants' Statement of Undisputed Material Facts Exhibit 56 - Deposition Transcript of Kevin Skoglund	State Defendants' Statement of Undisputed Material Facts	H, F, NE, T
783	State Defendants' Statement of Undisputed Material Facts Exhibit 57 - Deposition Transcript of Dr. Halderman (11/17/21)	State Defendants' Statement of Undisputed Material Facts	H, F, NE, T
784	State Defendants' Statement of Undisputed Material Facts Exhibit 58 - Deposition Transcript of Dr. Halderman (1/3/23)	State Defendants' Statement of Undisputed Material Facts	H, F, NE, T
785	State Defendants' Statement of Undisputed Material Facts Exhibit 59 - Expert	State Defendants' Statement of Undisputed Material Facts	H, F, NE

Exhibit No	Document Description	Document Type	Objections
	Report of Dr. Andrew Appel		
786	State Defendants' Statement of Undisputed Material Facts Exhibit 60 - Deposition Transcript of Dr. Andrew Appel	State Defendants' Statement of Undisputed Material Facts	H, F, NE, T
787	Declaration of J. Alex Halderman In Support of Motion for Preliminary Injunction (Aug. 8, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 1	H, F, NE
788	Declaration of Richard A. DeMillo (Sept. 9, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 3	H, F, NE
789	Declaration of J. Alex Halderman (Sept. 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 4	H, F, NE
790	Transcript of Michael Ian Shamos, Ph.D., J.D. depo (July 19, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 5	H, F, NE, T
791	Black Box Voting - Diebold TSx Evaluation, Security Alert (May 11, 2006)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 6	H, F,
792	Declaration of Duncan A. Buell (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 7	H, F, NE
793	Paper: Security Analysis of the Diebold AccuVote-TS Voting Machine (Sept. 13, 2006)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 8	H, F



Exhibit No	Document Description	Document Type	Objections
794	Meeting Minutes on Electronic Voting System Security - House of Representatives Committee on House Administration (July 7, 2004)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 9	H, F
795	Transcript of Michael Barnes depo (June 27, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 10	H, F, NE, T
796	Declaration of Michael Barnes (July 10, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 11	H, F, NE
797	Powerpoint from Kennesaw State University Center for Election Systems on The Georgia Voting System (Feb. 2014)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 12	H, F, A
798	Order - Denying Plfs' Motions for Preliminary Injunction (Sept. 17, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 13	NE, H, F
799	Declaration of Logan Lamb (Aug. 3, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 14	NE, H, F
800	Affidavit of Logan Lamb (June 30, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 15	NE, H, F
801	News Article from Kennesaw State University regarding the Center for Election Systems (Mar. 21, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 16	M, F, A, H

Exhibit No	Document Description	Document Type	Objections
	Emails with KSU individuals		
802	Email chain between Merle Steven King and Michael Barnes RE: Re: Follow Up from earlier email regarding security of elections.kennesaw.edu (Aug. 29, 2016)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 17	H, F
803	Supplemental Declaration of Logan Lamb (Jan. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 18	H, F, NE
804	Email chain between Michael Barnes and Stephen Craig Gay RE: Request for data retrieval (Mar. 17, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 19	H, F
805	Email confirmation of delivery to State Election Board, sent from Scott Holcomb to Curling Plfs (July 6, 2016)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 20	H, F, 104
806	Email chain between Christopher Dehner and Davide Gaetano RE: CES Network Assessment Meeting Notes 6/26 (July 19, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 21	H, F
807	Email chain between Christopher Dehner and Stephen Gay Re: CES server surplus (Aug. 9, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 23	H, F

<b>Exhibit No</b>	<b>Document Description</b>	<b>Document Type</b>	<b>Objections</b>
808	News Article from AP News re: Georgia election server wiped after suit filed (Oct. 26, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 25	H, F
809	TRANSCRIPT OF EVIDENTIARY HEARING PROCEEDINGS (Sept. 12, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 26	H, F, NE
810	DECLARATION OF J. ALEX HALDERMAN IN SUPPORT OF CURLING PLAINTIFFS' RESPONSE TO STATE DEFENDANTS' REQUEST FOR STATUS CONFERENCE AND NOTICE OF DECERTIFICATION OF GEMS/DRE SYSTEM AND CURLING PLAINTIFFS' REQUEST FOR HEARING (Jan. 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 27	H, F, NE, M
811	Instructions on Creating and Saving Export File in GEMS - Transferring Files from FireZilla for Election Day by Kennesaw State University Center for Election Systems	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 28	H, F, M
812	TRANSCRIPT OF EVIDENTIARY HEARING PROCEEDINGS (July 25, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 29	H, F, NE

Exhibit No	Document Description	Document Type	Objections
813	Transcript of James Oliver depo (Jan. 17, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 30	H, F, NE, T
814	Transcript of Sanford Merritt Beaver as Secretary of State 30(b)(6) and in personal capacity depo (Feb. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 31	H, F, NE, T
815	Declaration of Chris Harvey (Aug. 25, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 35	H, F, NE
816	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 36	H, F, NE
817	Cloudburst Security - Office of the Georgia Secretary of State FINAL Vendor Cyber Risk Assessment (Feb. 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 37	H, F
818	Cloudburst Security - Office of the Georgia Secretary of State Cyber Risk Assessment (Oct. 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 38	H, F
819	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia DRAFT (Aug. 25, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 39	H, F, A
820	Email chain between Josh Hood and Ted Koval RE: Fannin County IP (April 3, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 40	H, F

Exhibit No	Document Description	Document Type	Objections
821	Email chain between Dave Hamilton and Kimberly Lemley Re: [External]: Fwd: Potential leakage of voter data (Aug. 13, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 41	H, F
822	Email chain between Dave Hamilton and Merritt Beaver Re: The 590 Rule Attestation (Dec. 21, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 42	H, F
823	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION PROCEEDINGS (July 26, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 44	H, F, NE
824	Declaration of Eric. D. Coomer (Nov. 13, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 45	H, F, NE
825	STATE DEFENDANTS' RESPONSE TO COURT'S QUESTIONS ON NEW ELECTION SYSTEM VENDOR CONTRACT (July 30, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 46	H, F, NE
826	Transcript of Gabriel Sterling depo (Feb. 24, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 48	H, F, NE, T
827	Secretary of State 2020 Security of the Voter Registration System Artifacts and Attestation Pursuant to Rule 590-8-3-.01 (Dec. 18, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 49	H, F

Exhibit No	Document Description	Document Type	Objections
828	Order - State Defendants' Motion to Dismiss Curling Plaintiffs' Third Amended Complaint and Coalition Plaintiffs' First Supplemental Complaint (July 20, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 51	H, NE, F
829	<p>Bulletin State Election Board RE: GEMS Servers and Security (Sept. 12, 2016)</p> <p>Bulletin State Election Board RE: Suspected Russian Operative Activity (July 26, 2018)</p> <p>Bulletin State Election Board RE: Two Factor Authentication Security for ENET (July 30, 2018)</p> <p>Bulletin State Election Board RE: Physical Security Assessments Offered by Dept. of Homeland Security (Aug. 9, 2018)</p> <p>Bulletin State Election Board RE: Phishing Attempt (Aug 17, 2018)</p> <p>U.S. Dept. of Homeland Security Note re: U//FOUO Cybersecurity - Elections, Unattributed Network Activity -</p>	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 52	M, H, F

Exhibit No	Document Description	Document Type	Objections
	<p>Unattributed Cyber Actors Attempt to Gain Acces to City Government Network Prior to Primary Election Voting (Oct. 3, 2018)</p> <p>U.S. Dept. of Homeland Security Note re: U//FOUO Cybersecurity - Elections, Unattributed Network Acticity - Unattributed Actors Spoof Senior State Election Official's Email, Spear Phish City Clerk (Oct. 4, 2018)</p> <p>Memo re: Election Security Information Needs: Foreign Threats to U.S. Elections (Sept. 5, 2018)</p> <p>U.S. Dept. of Homeland Security Note re: (U) A Georgia Perspective on Threats to the 2018 U.S. Elections (Oct. 2, 2018)</p>		
830	Email chain between Chris Harvey and Ryan Germany RE: FW: 2020 Rule 590-8-3 Attestation and Assessment v 3.2 (Dec. 30, 2020) attachment Voter Registraton Certificate.pdf	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 53	H, F



Exhibit No.	Document Description	Document Type	Objections
831	Declaration of J. Alex Halderman (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 54	H, F, NE
832	Transcript of J. Alex Halderman depo (Nov. 17, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 55	H, F, NE, T
833	Transcript of Andrew W. Appel depo (Jan. 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 56	H, F, NE, T
834	Declaration of J. Alex Halderman (Oct. 2, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 57	H, F, NE
835	Email chain between Cathi Smothers and Election Center RE: Muscogee Help Please RE: [EXTERNAL] RE: Database Corrections (April 2, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 58	H, F
836	Declaration of Elizabeth Throop (Mar. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 59	H, F, NE
837	Email chain between Chris Harvey and Blake Evans (Nov. 13, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 60	H, F
838	Email chain between Nick Salsman and Dave Hamilto RE:	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 61	ID; H; F



Exhibit No	Document Description	Document Type	Objections
839	Election Office Notes: 10am 6/15/20 Meeting - Basic Overview most data provided by Michael Barnes. Nick and Terrence in attendance.	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 62	ID; H; F
840	Transcript of Derrick Gilstrap Fulton County Board of Registration and Elections 30(b)(6) depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 63	H, F, NE, T
841	Email chain between Michael Barnes and Scott Tucker RE: L&A Export to State (Jan. 15, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 64	H, F
842	Email chain between Kevin Rayburn and Veronica Johnson RE: ENR L&A Test Upload (June 2, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 65	H, F
843	Email chain between Chris Futrick and Paul Brandau RE: ElectionNet code / credentials posted publicly (Oct. 17, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 66	H, F
844	Transcript of James A. Barnes Jr. depo (July 20, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 67	H, F, NE, T
845	Email chain between Dave Hamilton and Michael Smith RE: DataLocker Follow Up (July 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 68	H, F
846	Transcript of David Hamilton depo (Jan. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 69	H, F, NE, T

Exhibit No	Document Description	Document Type	Objections
847	Transcript of Richard Barron depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 70	H, F, NE, T
848	Transcript of Juan Gilbert Ph.D. depo (Oct. 29, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 71	H, F, NE, T
849	Screenshot of Youtube video: DouglasNow.com, Dominion Voting Machine Flaws – 2020 Election Coffee County, Georgia Video 1, YouTube (Dec. 9, 2020), <a href="https://www.youtube.com/watch?v=46CAKyyObIs&amp;t=16s">https://www.youtube.com/watch?v=46CAKyyObIs&amp;t=16s</a>	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 72	M, OW, A, F, NR, IS
850	Photo of computer serial number and note: SOS_Georgia and Votes!	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 73	OW, A, F, NR, H
851	Photo of note on computer	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 74	OW, A, F, NR, H
852	Declaration of J. Alex Halderman (Nov. 22, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 75	H, F, NE, M
853	Secretary of State Investigation report RE: Coffee County - Miscellaneous - SEB2020-250 (Sept. 28, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 76	H, F

Exhibit No	Document Description	Document Type	Objections
854	Transcript of interview of Brad Raffensperger re: U.S. House of Representatives Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Nov. 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 77	H, F
855	Rev.com article "Georgia Secretary of State Brad Raffensperger Press Conference Transcript: Announces Hand Recount" (Nov. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 78	H, F
856	Secure, Accessible & Fair Elections (SAFE) Commission Report - Submitted to the General Assembly (Jan. 10, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 79	H, F
857	Joint Discovery Statement Regarding Production of FBI Server Image (Aug. 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 80	NE, H, F
858			Unknown, ID
859	Secretary of State press release "Security-Focused Tech Company, Dominion Voting to Implement new Verified Paper Ballot System" (July 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 82	H, F
860	STATE DEFENDANTS' SUPPLEMENTAL NOTICE REGARDING NEW ELECTION SYSTEM VENDOR CONTRACT (Aug. 9, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 83	NE, H, F

Exhibit No	Document Description	Document Type	Objections
861	Master Solution Purchase and Services Agreement between Dominion Voting Systems and Secretary of State of the State of Georgia (July 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 84	H, F
862	Transcript of Chris Harvey as Secretary of State 30(b)(6) (Jan. 28, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 85	H, F, T, NE
863	Screenshot of Tweet from Gabriel Sterling with responses from David Cross and Marilyn Marks (Oct. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 86	403, H, C, F, NR
864	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 87	H, F, NE
865	Declaration of J. Alex Halderman (Aug. 2, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 88	H, F, NE
866	Declaration (Eighth) of Philip B. Stark (Aug. 2, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 89	H, F, NE
867	Declaration (Second Supplemental) of Philip B. Stark (Oct. 22, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 90	H, F, NE
868	Paper "Addendum to Basic Security Requirements for Voting Systems" by Wenke Lee, Ph.D. (Jan. 3, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 92	H, F

Exhibit No	Document Description	Document Type	Objections
869	REBUTTAL REPORT OF ANDREW W. APPEL (July 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 93	H, F, NE
870	"What Voters are Asked to Verify Affects Ballot Verification: A Quantitative Analysis of Voters' Memories of their Ballots" - By Richard A. DeMillo and Robert S. Kadel (Georgia Institute of Technology) and Marilyn R. Marks (Coalition for Good Governance) (Nov. 23, 2018) (Revised April 11, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 94	H, F
871	Georgia Voter Verification Study by The University of Georgia Political Science School of Public and International Affairs (Jan. 22, 2021) draft version	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 95	H, F, A, NR
872	Letter from professors to Secretary Crittenden, Secretary Raffensperger, and SAFE Commission Members (Jan. 7, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 96	F, H, A
873	Declaration of J. Alex Halderman (Dec. 16, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 97	H, F, NE
874	Email chain between Marilyn Marks and Richard Barron RE:	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 98	ID; H; F

Exhibit No	Document Description	Document Type	Objections
	More on Athens (June 12, 2020)		
875	COALITION PLAINTIFFS' EXPERT DISCLOSURES – OPENING REPORTS (July 1, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 99	M; NE; H; F
876	Screenshot of Tweet thread from Ben Adida (Oct. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 100	H; F
877	Screenshot of Tweet thread from Jeanne Dufort and Ben Adida (Feb. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 101	H; F
878	Screenshot of Verified Voting map of Election Day Equipment - November 2022	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 102	H; F; A;
879	Declaration of Warren Stewart (Dec. 16, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 103	M; H; F; NE
880	Written Testimony of Verified Voting.org - Marian K. Schneider, President (June 5, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 104	H; F; A;
881	Transcript of Michael Barnes depo (Feb. 11, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 105	H; F; T; NE
882	Email chain between Chris Harvey and Ryan Germany RE: Election Certification (June 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 106	H; F

Exhibit No	Document Description	Document Type	Objections
883	Email chain between Blake Evans and Andrew Jackson RE: 3 images (Mar. 1, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 107	H; F
884	Letter from Governor Brian Kemp to the State Election Board members (Nov. 17, 2021)  Memo "Review of Inconsistencies in the Data Supporting the Risk Limiting Audit Report" (Nov. 17, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 108	M; H; F
885	Email chain between Kay Stimson and Jen Daulby RE: Voting issue in Georgia (Nov. 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 109	H; F
886	US Patent - Transparent Interactive Printing Interface (June 15, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 110	NR
887	Email chain between Chris Harvey and Frances Watson RE: FULTON COUNTY - MACHINES DOWN AND POLLING PLACES NOT OPEN (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 111	H; F
888	Email chain between Julie Houk and Ryan Germany RE: Election Protection hotline receiving reports of voting machine/poll pad issues in Floyd, Chatham, Fulton and	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 112	H; F



Exhibit No	Document Description	Document Type	Objections
	Gwinnett Counties (Aug. 11, 2020)		
889	Email chain between Ryan Germany and Frances Watson and Chris Harvey RE: Polling Machine Issues (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 113	H; F
890	Email chain between Chris Harvey and Richard Barron and Joseph Evans RE: Complaint - Down Machines (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 114	H; F
891	Email chain between Chris Harvey and Gabriel Sterling, Frances Watson, and Tom Feehan RE: Cross Keys High School- Dekalb (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 115	H; F
892	Email chain between Kevin Rayburn and Scott Tucker, Ryan Germany, Tom Feehan, and Cathi Smothers RE: continuing ENR issues (June 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 116	HF
893	Email chain between Chris Harvey and Joseph Evans RE: South Atlanta High School Polling Location machines not working (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 117	H; F



Exhibit No	Document Description	Document Type	Objections
894	Email chain between Gabriel Sterling and Tom Feehan, Chris Harvey RE: voter- 6 hour wait and not voted yet (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 118	H; F
895	Email chain between Chris Harvey and Erica Hamilton RE: MACHINES NOT WORKING, NO PAPER BALLOTS AVAIL (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 119	H; F
896	Email chain between Leigh Combs and Chris Harvey RE: Turning people away (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 120	H; F
897	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 121	H; NE; F
898	STATE DEFENDANTS' OBJECTIONS AND RESPONSES TO CURLING PLAINTIFFS' FIRST SET OF INTERROGATORIES (July 15, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 122	H; F; NE
899	STATE DEFENDANTS' RESPONSES AND OBJECTIONS TO CURLING PLAINTIFFS' SECOND SET OF INTERROGATORIES (Aug. 23, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 123	H; F; NE

Exhibit No	Document Description	Document Type	Objections
900	TRANSCRIPT OF TELEPHONE CONFERENCE PROCEEDINGS (Oct. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 125	H; F; NE
901	Response to Revised Interrogatories 15, 16, 19, 20, 21, 25, 26	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 126	H; F; NE
902	Email chain between Frances Watson and Pamela Jones RE: Fwd: Coffee County (May 11, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 127	H; F
903	Transcript of Anh Le depo (Nov. 4, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 128	H; F; NE; T
904	Transcript of Mathew Mashburn depo (Nov. 4, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 129	H; F; NE; T
905	Transcript of Rebecca Nash Sullivan, Esq. depo (Nov. 5, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 130	H; F; NE; T
906	Declaration of J. Alex Halderman (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 131	H; F; NE
907	Photos of Video of pollpads, scanning, receipt	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 133	M; OW; H; F
908	Photo of Acceptance Sheet of General Election Ballot (July 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 134	OW; H; F; C

Exhibit No	Document Description	Document Type	Objections
909	Photo of pollpad receipt re: Sunday Liquor Sales total votes	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 135	OW; H; F; C
910	Dominion "2.02 Democracy Suite System Overview" (Nov. 26, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 136	H; F
911	Transcript of APC Raffensperger 21022, Speakers Brad Raffensperger, Mark Niesse, and Nicole Carr (Feb. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 137	H; F
912	Transcript of Sanford Merritt Beaver as Secretary of State 30(b)(6) depo (Mar. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 138	H; F; NE; T
913	Secretary of State press release "Secretary Raffensperger Calls on J. Alex Halderman to Agree to Release "Secret Report" and Pre-Election Testimony" (Jan. 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 139	H; F
914	Transcript of Janice W. Johnston M.D. (Aug. 23, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 140	H; F; NE; T
915	Transcript of Sara Tindall Ghazal (Nov. 5, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 141	H; F; NE; T

Exhibit No.	Document Description	Document Type	Objections
916	Transcript of Edward H. Lindsey Jr. (Aug. 31, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 142	H; F; NE; T
917	Statement of Interest RE: Vulnerability Disclosure Issues in Curling v. Raffensperger, No. 17-cv-2989 (N.D. Ga.) from Brandon Wales CISA to Brian Boynton Acting Assistant Attorney General (Jan. 20, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 143	H; F; NE
918	Notice from CISA "in response to matters raised at the Court's February 2, 2022 hearing regarding CISA's Coordinated Vulnerability Disclosure (CVD) process." (Feb. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 144	H; F; NE
919	Status Report from CISA "on the final steps of CISA's Coordinated Vulnerability Disclosure process." (May 19, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 145	H; F; NE
920	CISA ICS Advisory (ICSA-22-154-01) - Vulnerabilities Affecting Dominion Voting Systems ImageCast X (June 3, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 146	H, F
921	Status Report from CISA "to update the Court and the parties on CISA's ongoing Coordinated Vulnerability Disclosure	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 147	H; F; NE

Exhibit No	Document Description	Document Type	Objections
	(CVD) process." (Mar. 14, 2022)		
922	Status Report from CISA "to update the Court and the parties on CISA's ongoing Coordinated Vulnerability Disclosure (CVD) process." (Apr. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 148	H; F; NE
923	Transcript of Gabriel Sterling as Secretary of State 30(b)(6) depo (Oct. 12, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 149	H, F, NE, T
924	Transcript of Wendell Stone as Coffee County Board of Elections & Registration 30(b)(6) depo (Sept. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 150	H, F, NE, T
925	Transcript of Eric B. Chaney 30(b)(6) depo (Aug. 15, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 151	H, F, NE, T
926	Paper "Basic Security Requirements for Voting Systems" by Wenke Lee, Ph.D. (Oct. 8, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 152	H, F
927	Declaration of J. Alex Halderman in Coomer v. Trump (Aug. 31, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 153	NE, H, F
928	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia (Apr. 9, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 154	H, F

Exhibit No	Document Description	Document Type	Objections
929	Fortalice Red Team Penetration Test and Cyber Risk Assessment, State of Georgia, Office of the Secretary of State - November 2018	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 155	H, F
930	Fortalice Solutions Web Vulnerability Remediation Checks, Secretary of State Georgia DRAFT (July 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 156	H, F
931	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia DRAFT (May 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 157	H, F
932	Fortalice Solutions Firmware Comparison and Configuration Analysis, Secretary of State Georgia DRAFT (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 158	H, F
933	Email chain between Meghan Aubry and Adam Sparks RE: Curling, et al. v. Raffensperger, et. al subpoena - Fortalice initial production in response to subpoena (July 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 159	H, F
934	Email chain between Chris Harvey and Frances Watson RE: SOS complaint in Fulton (Nov. 6, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 160	H, F

Exhibit No	Document Description	Document Type	Objections
935	Powerpoint re: Fulton County SEB2020-027 Election Day Issues	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 161	H, F
936	Email chain between Chris Harvey and Frances Watson RE: photographs taken in poll in Hart County (Nov. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 162	H, F
937	Email chain between Chris Harvey and Samantha Sheldon RE: Jefferson County Board of Elections (Feb. 26, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 163	H, F
938	Email chain between Michael Barnes and Clinch County Elections RE: Data Seals (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 164	H, F
939	SOS Request for Changes "RFC_Election Center Data Center" (Aug. 16, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 165	H, F, PK
940	Transcript of Dominic Olomo depo (Sept. 4, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 166	H, F, T, NE
941	Transcript of Dominic Olomo 30(b)(6) Fulton County Board of Registration and Elections depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 167	H, F, T, NE
942	Email chain between Dwight Brower and Richard Barron, Derrick Gilstrap and Timothy	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 168	H, F



Exhibit No	Document Description	Document Type	Objections
	Cummings RE: Concerns over handling of Early voting ballots (Nov. 20, 2020)		
943	Notice on the Continuation of the National Emergency With Respect to Foreign Interference In or Undermining Public Confidence in United States Elections (Sept. 7, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 169	H, F
944	Email chain between Merritt Beaver and Klint Walker RE: DHS (Nov. 12, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 170	H, F
945	Email chain between Kevin Rayburn and Jordan Fuchs RE: I bet I can hack your electronic voting machines. (Apr. 5, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 171	H, F
946	Screenshot of text message thread from Eric Chaney (March 2018 - March 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 172	H, F, M, I, PK
947	Transcript of Misty Hampton depo (Nov. 11, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 173	H, F, T
948	Screenshot of text message thread to Eric and Cathy	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 174	H, F, I



Exhibit No	Document Description	Document Type	Objections
949	Transcript of Dean M. Felicetti depo (Sept. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 175	H, F, T, NE
950	Screenshots re: "Coffee County Board of Elections and Registration Elections Office Security Video January 7, 2021"	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 176	I, A, OW, F
951	Screenshots re: "January 8, 2021 From 5pm to 6pm missing video"	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 177	I, A, OW, F
952	Email chain between Paul Maggio and Sidney Powell RE: 55A1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement (Jan. 8, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 178	H, F
953	SEALED - Coffee County server activity spreadsheet	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 179	I, A, H, F
954	Transcript of Kevin Skoglund depo (Dec. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 181	H, F, T, NE
955	Screenshots of Coffee County video footage of Jeffrey Lenberg (Jan. 27, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 182	I, A, OW, F
956	Screenshots of Coffee County video footage of Doug Logan and Jeffrey Lenberg (Jan. 18 and 19, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 183	I, A, OW, F

Exhibit No	Document Description	Document Type	Objections
957	Transcript of Jeffrey Lenberg depo (Nov. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 184	H, F, T, NE
958	"Coffee County ICC & ICP Reports"	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 185	H, F, A, I
959	Email chain between Misty Hampton and Tracie Vickers RE: Open Records Request (Feb. 4, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 186	H, F, A, I
960	Declaration of J. Alex Halderman (Jan. 7, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 187	H, F, NE
961	Email chain between Bruce Brown and Defendants' Counsel RE: JSON Format Cast Vote Records on the Internet (July 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 188	H, F, I
962	Screenshot of Tweet from Juha Keskinen RE: "Dominion Voting Systems sues 'MyPillow Guy' for \$1.3 billion" (Feb. 26, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 189	H, F, I, M, NR, A, PK
963	Letter from Jil Ridlehoover to Board of Elections Chair re her resignation from Coffee County (Feb. 25, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 190	H, F, I, A
964	Letter from Misty Hampton to Board of Elections Chair re her resignation from Coffee County (Feb. 25, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 191	H, F, I

Exhibit No	Document Description	Document Type	Objections
965	Screenshot of text message thread to Misty Hampton (Feb. 21, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 192	H, F, M, I
966	Transcript of Jil Ridlehoover depo (Aug. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 193	H, F, T, NE
967	Fortalice Solutions Incident Response, Evidence Collection Process - Windows Operating Systems (Feb. 26, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 194	H, F
968	Secretary of State press release "Raffensperger to Replace Coffee County Election Equipment, End Distraction for Local Election Officials" (Sept. 23, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 195	H, F
969	Doc. 1377-4 - Hash Verification	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 197	H, F, I, A, PK
970	Email chain between Bryan Tyson and all counsel RE: Secretary Raffensperger's Channel 11 Interview (Sept. 26, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 200	H, F, NR
971	Declaration of James Persinger (Nov. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 201	H, F, NE

Exhibit No	Document Description	Document Type	Objections
972	Email chain between Bryan Tyson and Russ Abney and Caroline Middleton RE: Supplemental discovery obligations—Coffee County investigation files (Jan. 16, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 202	H, F, NR
973	Letter from Steven Ellis Deputy General Counsel to GBI Director Vic Reynolds Re: Request for Assistance in Investigation (Aug. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 203	H, F
974	Email chain between Ryan Germany and Frances Watson and Chris Harvey RE: Polling Machine Issues (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 205	H, F
975	Email chain between Ryan Germany, Bryan Tyson, Carey Miller, and Vincent Russo RE: FW: GASOS ORR #22-360 from The Associated Press (Aug. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 206	H, F
976	Email chain between Sara Koth and Steven Ellis RE:FW: Open Records Request (July 12, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 207	H, F
977	Email chain between Steven Ellis and Anthony Rowell, Ryan Germany RE: Coffee County SEB investigation (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 208	H, F, I

Exhibit No	Document Description	Document Type	Objections
978	Screenshots of Coffee County video footage (Dec. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 209	I, A, OW, F, C
979	Screenshots of Coffee County video footage (Dec. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 210	I, A, OW, F, C
980	Transcript of Robert A. Sinners depo (Sept. 28, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 211	H, F, T, NE
981	Email chain between Harry MacDougald and Robert Sinners RE: Data File Needed for Vote Swapping/Switching (Nov. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 212	H, F
982	LABELED Exhibit 215 [doc no. 1635-42] Dominion Voting press release "Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System" (May 6, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 213	H, F
983	Photo of note on computer (same as exhibit 74)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 214	A, OW, F, Q, C
984	Email chain between Frances Watson and Pamela Jones RE: Fwd: Coffee County (May 11, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 215	H, F, I

Exhibit No	Document Description	Document Type	Objections
985	Article from 11Alive "Questions raised in timeline of state response to Coffee County breach" (Sept. 26, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 216	H, F, I
986	Screenshot of video "The Carter Center, Restoring Confidence in American Elections Panel 3 -April 29, 2022, YouTube (May 9, 2022)" of Gabriel Sterling with quote "So we are still dealing with that here and we still have to prove negatives in all these cases. It's similar across the board. But like, we had claims... even recently there was people saying: 'We went to Coffee County. We imaged everything.' There's no evidence of any of that. It didn't happen."	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 217	H, F, I, OW, A
987	Sharepoint Listing Investigations for Coffee County	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 218	H, F, I
988	Declaration (Seventh) Philip B. Stark (Sept. 13, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 219	H, F, NE
989	Transcript of Philip Stark depo (Dec. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 220	H, F, T, NE

Exhibit No	Document Description	Document Type	Objections
990	Declaration Philip B. Stark (Jan. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 221	H, F, NE
991	Declaration (Eighth) of Philip B. Stark (Aug. 2, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 222	H, F, NE
992	Declaration of Andrew W. Appel In Support of Motion for Preliminary Injunction (Dec. 13, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 223	H, F, NE
993	Declaration (Fifth) of Philip B. Stark (Aug. 23, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 224	H, F, NE
994	Declaration Philip B. Stark (filed Sept. 11, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 225	H, F, NE
995	Declaration of Donna A. Curling (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 226	NE
996	Declaration of Donna A. Curling In Support of Brief Regarding Standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 227	NE
997	Transcript of Donna Curling depo (Jan. 19, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 228	T, NE
998	Secretary of State press release "Secretary Raffensperger Calls On Department Of Justice To Investigate	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 229	H, F



Exhibit No	Document Description	Document Type	Objections
	Allegations Of Fulton County Shredding Applications" (Oct. 11, 2021)		
999	Transcript of Donna Price depo (Mar. 8, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 230	T, NE
1000	Declaration of Donna Price in support of standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 231	NE
1001	Declaration of Jeffrey H. E. Schoenberg In Support of Brief on Standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 232	NE
1002	Transcript of Jeffrey Schoenberg depo (Oct. 19, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 233	T, NE
1003	Declaration of Donna Price (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 234	NE
1004	Declaration of Jeffrey Schoenberg (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 235	NE
1005	Declaration of Jeffrey Schoenberg (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 236	NE
1006	Screenshot of video "Universite de Geneve (UNIGE), How to safeguard democracy? A look back at the last American presidential	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 237	H, F, I, OW, A



Exhibit No	Document Description	Document Type	Objections
	election. Gabriel Sterling, YouTube (Oct. 4, 2021, uploaded Nov. 25, 2021)" with quote		
1007	Declaration of Jeffrey Schoenberg (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 238	NE
1008	Declaration of Amber F. Reynolds (Aug. 20, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 239	H, F, NE
1009	Email chain between Alex Wan and Richard Barron and Marilyn Marks RE: Important report on Dominion system (Apr. 21, 2021	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 243	
1010	Email chain between Marilyn Marks, Fulton Election Board and numerous individuals from the City of Atlanta, Sandy Springs, Johns Creek, Roswell, Alpharetta RE: Fulton Officials--Urgent Voting Protections Required--Needed Actions (June 6, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 244	
1011	Email chain between Marilyn Marks and Richard Barron RE: FW: Correspondence to Fulton last month re scanner issue (July 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 245	

Exhibit No	Document Description	Document Type	Objections
1012	Email chain between Marilyn Marks and Fulton County Election Board RE: Urgent Issues for BRE Consideration--Voting System Problems (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 246	
1013	Email chain between Felicia Strong-Whitaker and Janay Wilborn, Robb Pitts, and Richard Barron RE: Logic and Accuracy Test for August election (July 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 247	H, F
1014	Email chain between Timothy Cummings and Dwight Brower, Michael Barnes RE: Voter with Double QR Codes on Ballot (Oct. 22, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 248	H, F
1015	Transcript of Cathleen Latham depo (Aug. 8, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 249	H, F, T, NE
1016	Screenshots of Coffee County video footage (Jan. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 250	I, A, OW, F, C
1017	Screenshots of Coffee County video footage (Jan. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 251	I, A, OW, F, C
1018	Screenshot of Tweet thread between Ben Adida and David Cross (Oct. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 252	H, F, I, NR, 403

Exhibit No	Document Description	Document Type	Objections
1019	Transcript of Benjamin Cotton depo (Aug. 25, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 253	H, F, T, NE
1020	Powerpoint re: Cybersecurity Considerations for Voting Systems by Wenke Lee	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 254	H, F
1021	Declaration of Kevin Skoglund (Dec. 5, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 255	H, F, NE
1022	Declaration of Benjamin Cotton (June 8, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 256	H, F, NE
1023	Transcript of Doug Logan depo (Nov. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 257	H, F, T, NE
1024	Shipping confirmation "FW: Coffee County Forensics FEDEX Request" (Apr. 27, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 258	H, F, I
1025	Secretary of State Investigation report RE: Coffee County - Miscellaneous - SEB2020-250 (Sept. 28, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 259	H, F
1026	Screenshot of video "The Carter Center, Restoring Confidence in American Elections Panel 3 -April 29, 2022, YouTube (May 9, 2022)" of Gabriel Sterling with quote "So	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 260	H, F, I, OW, A

Exhibit No	Document Description	Document Type	Objections
	we are still dealing with that here and we still have to prove negatives in all these cases. It's similar across the board. But like, we had claims... even recently there was people saying: 'We went to Coffee County. We imaged everything.' There's no evidence of any of that. It didn't happen."		
1027	Secretary of State press release "Georgia's 2022 Statewide Risk Limiting Audit Confirms Results" (Nov. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 261	H, F
1028	Transcript of Proceedings before the Honorable Judge John J. Tuchi - Motion Hearing in Kari Lake v. Katie Hobbs (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 262	NE, H, F
1029	Photos of tags with flashdrives redacted	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 263	M, F
1030	Transcript of J. Alex Halderman depo (Jan. 3, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 264	NE, T, H, F
1031	Transcript of Alex Andrew Cruce depo (Nov. 22, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 265	NE, T, H, F

Exhibit No	Document Description	Document Type	Objections
1032	Transcript of Blake Edward Voyles depo (Nov. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 266	NE, T, H, F
1033	Photos of tags with flashdrives redacted	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 267	NE, ID
1034	Screenshot of text message thread from Eric Chaney (March 2018 - March 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 268	H, F
1035	Email chain between Paul Maggio and Sidney Powell RE: 55A1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement (Jan. 8, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 269	H, F
1036	Email chain between Steven Ellis and Anthony Rowell, Ryan Germany RE: Coffee County SEB investigation (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 271	H, F
1037	Transcript of telephone discovery conference (Apr. 7, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 272	NE, H, F, R
1038	Declaration of Donna A. Curling (May 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 273	NE
1039	Declaration of Donna Price (May 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 274	NE

Exhibit No	Document Description	Document Type	Objections
1040	Declaration of Jeffrey H. E. Schoenberg In Support of Motion for Preliminary Injunction (May 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 275	NE
1041	Publication in Election Law Journal "Ballot-Marking Devices (BMDs) Cannot Assure the Will of the Voters" (Feb. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 287	H, F
1042	Fulton County Defendants' Response to Plaintiffs' Second Request for Admission (Aug. 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 290	NE
1043	Email chain between Robert McGuire and Josh Belinfante, Bruce Brown, Cary Ichter, David Cross, Marilyn Marks, and Jill Connors RE: Coalition's request for missing discovery files (Mar. 25, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 291	H, F
1044	Declaration of Donna A. Curling (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 293	NE
1045	Declaration (Supplemental) of Marilyn Marks (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 294	NE
1046	Declaration of Donna A. Curling In Support of Plfs' Motion for Preliminary Injunction (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 297	NE

Exhibit No	Document Description	Document Type	Objections
1047	Declaration of Donna Price (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 298	NE
1048	Declaration (Supplemental) of Kevin Skoglund (July 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 301	NE, H, F
1049	Harrison Floyd Consolidated Opposition to Motions to Quash Subpoenas	Court Filing - <i>State of Georgia v. Harrison Floyd, et al.</i> , 23SC188947 (Fulton County Superior Court)	NP, NE, H, F
1050	Matthew Bernhard, Allison McDonald, Henry Meng, Jensen Hwa, Nakul Bajaj, Kevin Chang, and J. Alex Halderman. " <i>Can Voters Detect Malicious Manipulation of Ballot Marking Devices?</i> ," 2020 IEEE Symposium on Security and Privacy (SP), San Francisco, CA, USA, 2020, pp. 679-694, doi: 10.1109/SP40000.2020.00118. May 2020. <a href="https://doi.org/10.1109/SP40000.2020">https://doi.org/10.1109/SP40000.2020</a> .	<a href="https://ieeexplore.ieee.org/document/9152705">https://ieeexplore.ieee.org/document/9152705</a>	NP, H, F, NE
1051	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to BMD verification rates for ballots.	Tweet	NP, Unknown, H, F
1052	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to BMD verification rates	Tweet	NP, Unknown, H, F



Exhibit No	Document Description	Document Type	Objections
	for ballots and the lack of study of paper ballots.		
1053	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to verification rates.	Tweet	NP, Unknown, H, F
1054	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to the market for voting equipment.	Tweet	NP, Unknown, H, F, NR
1055	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to Americans who don't like paper ballots.	Tweet	NP, Unknown, H, F, NR
1056	2021.03.18 Screenshot of Tweet from Matt Bernhard relating to "cosmic rays" affecting voting machines.	Tweet	NP, Unknown, H, F, NR
1057	2021.03.18 Screenshot of Tweet from Matt Bernhard relating to "cosmic rays" affecting voting machines, and providing source.	Tweet	NP, Unknown, H, F, NR
1058	2020.10.26 Screenshot of Tweet from Matt Bernhard relating to "fearmongering advocates" helping suppress voter turnout.	Tweet	NP, Unknown, H, F, NR
1059	2020.10.12 Screenshot of Tweet from Matt Bernhard responding to Michigan Engineering for avoiding voting if no paper trail.	Tweet	NP, Unknown, H, F, NR



Exhibit No	Document Description	Document Type	Objections
1060	2020.10.12 Screenshot of Tweet from Matt Bernhard stating that his study did not find that "almost 95% of votes don't review their printouts."	Tweet	NP, Unknown, H, F
1061	2020.10.12 Screenshot of Tweet from Matt Bernhard clarifying that "40% of our participants reviewed their ballots."	Tweet	NP, Unknown, H, F
1062	2020.11.21 Screenshot of Tweet from Alex Halderman stating that the risk-limiting audit in Georgia was positive. Gabriel Sterling replying.	Tweet	NP, Unknown, H, F
1063	2020.11.15 Screenshot of Tweet from Alex Halderman stating that "I've seen no credible evidence whatsoever that the 2020 presidential outcome was hacked."	Tweet	NP, Unknown, H, F
1064	2020.11.13 Screenshot of Tweet from Alex Halderman retweeting Frank Bajak regarding U.S. election security challenges.	Tweet	NP, Unknown, H, F
1065	2020.11.12 Screenshot of Tweet from Alex Halderman replying to a tweet of Donald Trump regarding Dominion not having deleted votes.	Tweet	NP, Unknown, H, F

Exhibit No	Document Description	Document Type	Objections
1066	2020.11.24 Screenshot of Tweet from Alex Halderman reponding to Julian Sanchez saying that "the strongest claim real election security experts can make is that hacking outomces would be 'complicated' and there's no credible evidence it happened."	Tweet	NP, Unknown, H, F
1067	2020.11.15 Screenshot of Tweet from Alex Halderman reponding to Tweet from Joseph Nierenberg.	Tweet	NP, Unknown, H, F
1068	2020.11.15 Screenshot of Tweet from Alex Halderman reponding to Tweet from Joseph Nierenberg. Halderman stated that "If an attacker can falsely convince people the results are wrong, that's also a security failure."	Tweet	NP, Unknown, H, F
1069	2020.11.15 Screenshot of Tweet from Alex Halderman reponding to Tweet from Joseph Nierenberg regarding election security.	Tweet	NP, Unknown, H, F
1070	2020.11.11 Screenshot of Tweet from Alex Halderman regarding Georgia's previous voting machines.	Tweet	NP, Unknown, H, F

Exhibit No	Document Description	Document Type	Objections
1071	2020.11.11 Screenshot of Tweet from Alex Halderman regarding voters voting by different methods.	Tweet	NP, Unknown, H, F
1072	2020.11.24 Screenshot of Tweet from Alex Halderman replying to John Moser regarding auditing ballots.	Tweet	NP, Unknown, H, F
1073	2020.11.24 Screenshot of Tweet from Alex Halderman replying to John Moser regarding forensic analysis.	Tweet	NP, Unknown, H, F
1074	2023.10.15 Screenshot of Tweet from Marilyn Marks regarding Sidney Powell motion and Fani Willis.	Tweet	NP, Unknown, NR
1075	2021.07.10 Screenshot of Tweet from Marilyn Marks stating that BMDs are not safe to vote on.	Tweet	NP, Unknown
1076	2021.08.23 Screenshot of Tweet from Marilyn Marks responding to PeeplesWatcher regarding explaining what a BMD ballot looks like.	Tweet	NP, Unknown, H, F, I
1077	2021.07.10 Screenshot of Tweet from Marilyn Marks telling people to ask their GA officials to read Andrew Appel's newest report.	Tweet	NP, Unknown, NR
1078	2022.01.20 Screenshot of Tweet from Marilyn	Tweet	NP, Unknown

Exhibit No	Document Description	Document Type	Objections
	Marks stating that "there's no evidence that widespread fraud or hacking occurred."		
1079	2021.09.11 Screenshot of Tweet from Marilyn Marks regarding California voters.	Tweet	NP, Unknown, NR
1080	2021.09.12 Screenshot of Tweet from Marilyn Marks regarding not being affiliated with the GOP.	Tweet	NP, Unknown, NR, 403
1081	2021.09.12 Screenshot of Tweet from Marilyn Marks regarding RLAs implementation.	Tweet	NP, Unknown
1082	2021.09.12 Screenshot of Tweet from Marilyn Marks regarding audit for California recall.	Tweet	NP, Unknown, NR
1083	2021.09.12 Screenshot of Tweet from Marilyn Marks regarding "citizen inspections" shouldn't be called audits.	Tweet	NP, Unknown, NR
1084	2021.11.23 Screenshot of Tweet from Marilyn Marks regarding the 2020 election.	Tweet	NP, Unknown, NR
1085	2021.09.04 Screenshot of Tweet from Marilyn Marks regarding doing verification work during when GA law permitted it.	Tweet	NP, Unknown, NR
1086	2021.04.08 Screenshot of Tweet from Kevin Skoglund regarding	Tweet	NP, Unknown, H, F

Exhibit No	Document Description	Document Type	Objections
	election not needed to be easy/hard to hack.		
1087	2021.04.08 Screenshot of Tweet from Kevin Skolgund regarding reliability of election equipment.	Tweet	NP, Unknown, H, F
1088	2021.04.08 Screenshot of Tweet from Kevin Skolgund regarding malware affecting election results.	Tweet	NP, Unknown, H, F
1089	2021.02.10 Screenshot of Tweet from Kevin Skoglund regarding vendors being able to do both hardware and software engineering change orders.	Tweet	NP, Unknown, H, F
1090	2021.02.10 Screenshot of Tweet from Kevin Skoglund regarding his knowledge of de minimis software changes allowed prior to memo from November 2019.	Tweet	NP, Unknown, H, F
1091	2021.02.10 Screenshot of Tweet from Kevin Skoglund replying to Eddie Perez regarding de minimus software changes before 2019.	Tweet	NP, Unknown, H, F
1092	2020.11.16 Screenshot of Tweet from Kevin Skoglund regarding signing letter rebuking Trump's claims as fraud and unsubstantiated.	Tweet	NP, Unknown, H, F

Exhibit No	Document Description	Document Type	Objections
1093	2020.09.19 Screenshot of Tweet from Kevin Skoglund to election officials asking to contact their IT departments for weekly data backups.	Tweet	NP, Unknown, H, F
1094	2020.08.08 Screenshot of Tweet from Ash's Night Fury to Kevin Skoglund regarding voting systems connected to the internet.	Tweet	NP, Unknown, H, F
1095	2020.08.08 Screenshot of Tweet from Kevin Skoglund responding to Ash's Night Fury regarding not observing modems sold to all states listed.	Tweet	NP, Unknown, H, F
1096	2020.11.29 Screenshot of Tweet from Philip Stark replying to RedPillMagaMom regarding his interviews with MSM and Fox.	Tweet	NP, Unknown, H, F
1097	2020.11.20 Screenshot of Tweet from Philip Stark replying to Ben Adida regarding reconciled paper trail and standard ballot accounting.	Tweet	NP, Unknown, H, F
1098	2020.11.08 Screenshot of Tweet from Philip Stark regarding risk-limiting audit.	Tweet	NP, Unknown, H, F
1099	2020.11.08 Image from Philip Stark Tweet. Image of ballots cast in 2020 contest per	Image contained in Tweet	NP, Unknown, H, F

Exhibit No	Document Description	Document Type	Objections
	candidate. Risk limit audit shown for 5%.		
1100	Marilyn Marks Tweet thread, November 21, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1330418629658218497">https://twitter.com/MarilynRMarks1/status/1330418629658218497</a>	NP, NR, I
1101	Marilyn Marks Tweet thread, November 22, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1330418629658218497">https://twitter.com/MarilynRMarks1/status/1330418629658218497</a>	NP, NR, I
1102	Email from Marilyn Marks to Stephen Day, FW: Non-compliant "recount"/"RLA" November 13, 2020	CGG2021001276675 to CGG2021001276680	H, F
1103	Jeanne Dufort Tweet, November 22, 2020	<a href="https://twitter.com/dufort_jeanne/status/1330733994070118400">https://twitter.com/dufort_jeanne/status/1330733994070118400</a>	NP, H, NR, I
1104	Marilyn Marks Tweet thread, November 14, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1327705945569447936">https://twitter.com/MarilynRMarks1/status/1327705945569447936</a>	NP, I, H, F, NR
1105	Marilyn Marks Tweet thread, October 24, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1320085428062617602">https://twitter.com/MarilynRMarks1/status/1320085428062617602</a>	NP, I, H, F, NR, NE
1106	Marilyn Marks Tweet thread, November 17, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1328745280645246976">https://twitter.com/MarilynRMarks1/status/1328745280645246976</a>	NP, I, NR, 403
1107	Marilyn Marks Tweet thread, November 17, 2020	<a href="https://twitter.com/MarilynRMarks1/status/1328758039395131392">https://twitter.com/MarilynRMarks1/status/1328758039395131392</a>	NP, I, NR, 403
1108	Marilyn Marks Tweet thread, January 24, 2021	<a href="https://twitter.com/MarilynRMarks1/status/1353392784724553734">https://twitter.com/MarilynRMarks1/status/1353392784724553734</a>	NP, I
1109	Marilyn Marks Tweet thread, January 12, 2021	<a href="https://twitter.com/MarilynRMarks1/status/1349014884277768199">https://twitter.com/MarilynRMarks1/status/1349014884277768199</a>	NP, I, NR
1110	Marilyn Marks Tweet thread, January 1, 2021	<a href="https://twitter.com/MarilynRMarks1/status/1345217977835266048">https://twitter.com/MarilynRMarks1/status/1345217977835266048</a>	NP, I, NR, 403

Exhibit No	Document Description	Document Type	Objections
1111	2021.02.14 Email to marilyn@uscgg.org referencing attachment "Georgia Republican Party Election Conference Task Force Report-Final.pdf"	CGG20220000001	
1112	Georgia Republican Party Election Conference Task Force Report	CGG20220000002-10	
1113	2020.12.26 Email to marilyn@uscgg.org re: <a href="https://fb.watch/2DAvX-2yAo/">https://fb.watch/2DAvX-2yAo/</a>	CGG20220000011	
1114	2020.12.25 Email to marilyn@uscgg.org re: My counties. (List of counties under her caucus: "They all have populations under 80,000"	CGG20220000012-13	
1115	Email to marilyn@uscgg.org dated 12.27.2020 re: Please proof this and let me know. I will attach the letter when I send to him.	CGG20220000014	
1116	Email to marilyn@uscgg.org dated 02.21.2021 re: BMDs do not meet the 2016 HB16 requirements	CGG20220000015	
1117	Email to Marilyn Marks dated 12.27.2020 re: Early opening of AB mail ballots; "You are not the Grinch!"	CGG20220000016-17	



Exhibit No	Document Description	Document Type	Objections
1118	Email to Marilyn Marks dated 02.16.2021 re: Even Gov. Kemp Would Be Denied a Ballot	CGG20220000018-20	
1119	Email to Marilyn Marks dated 08.03.2011 re: Excellent Experts' reports served tonight - All public information	CGG20220000021	
1120	Email to Marilyn Marks dated 08.14.2021 re: FW: Replace the Dominion System Before the 2022 Primary InsiderAdvantageGeorgia	CGG20220000022-23	
1121	Email to Marilyn Marks dated 12.29.2020 re: Ed Voyles	CGG20220000024	
1122	Email to Marilyn Marks dated 12.27.2020 re: Lamar County GOP chair	CGG20220000025	
1123	Email to Marilyn Marks dated 12.27.2020 re: Lamar County GOP chair	CGG20220000026	
1124	Email to Marilyn Marks dated 08.15.2021 re: Replace the Dominion System Before the 2022 Primary InsiderAdvantageGeorgia	CGG20220000027-28	
1125	Email to Marilyn Marks dated 02.14.2021. Re: Tip of iceberg disclosure of tabulation and system problems	CGG20220000029	

Exhibit No	Document Description	Document Type	Objections
1126	Email to Marilyn Marks dated 10.21.2021 re: Update (Response from Cobb County attorney requesting tomorrow to answer questions)	CGG20220000030	
1127	Email to Marilyn Marks dated 09.20.2022 FW: SOS - Expert report affirms accuracy of Antrim County presidential election results	CGG20220000031-32	
1128	03.26.2021 Report entitled Analysis of the Antrim County, Michigan November 2020 Election Incident by J. Alex Halderman	CGG20220000033-86	
1129	Email to Marilyn Marks dated 12.26.2020 re: 10:45 ET? Re: Zoom Call	CGG20220000087	
1130	Email to Marilyn Marks dated 12.27.2020 re: My counties	CGG20220000088-90	
1131	Email to Marilyn Marks dated 2020.12.26 re: zoom call	CGG20220000091	
1132	Email from Marilyn Marks to Ed Voyles, Misty Hampton, and Cathy Latham dated 02.20.2021 re: Local Option for HMPB-exists today if lines are longer than 30min	CGG20220000092	
1133	Georgia Regulation Ga. Comp. R & Regs. R. 183-	CGG20220000093-96	

Exhibit No	Document Description	Document Type	Objections
	1-12-.11 Conducting Elections		
1134	Email to Marilyn Marks dated 06.12.2021 to Cathy Latham re: demanding \$75 million refund	CGG20220000097-100	
1135	Email to Marilyn Marks dated 12.26.2020 re: 10:45 ET? Re: Zoom Call	CGG20220000101	
1136	Email from Marilyn Marks to Cthay Latham, Ed Voyles re: Annotations on Hutton-pulitzer testimony attaching GAsenateJudiciary12.3.2020 Part 1_MRM jhp2.dockx	CGG20220000102	
1137	GA Senate Judiciary Sub-committee on Election Law 12.30.2020	CGG20220000103-20	
1138	Email from Marilyn Marks to Welch47@protonmail.com; Cathy Latham re: Cobb official recount docs attachments: Official and Complete - Election Summary Report.pdf, Official and Complet - SOVC.pdf	CGG20220000121	
1139	Election Summary Report	CGG20220000122	
1140	Statement of Votes Cates General Election COBB dated 11.03.2020	CGG20220000123-137	

Exhibit No	Document Description	Document Type	Objections
1141	Email from Marilyn Marks to Cathy Latham re: Dominion Contract Info, Attachments: 20190729-FA-Dominion-Contract.pdf, "Pages from Dominion021577-026667-6copy.pdf	CGG20220000138	
1142	Master Solution Purchase and Services Agreement between Dominion Voting Systems and Secretary of State of the State of Georgia (July 29, 2019)	CGG20220000139-250	
1143	Email from Mike Frontera to Ryan Germany dated 03.02.2020 re:Updated Amendement; Attachment GASOS Amendment 1 03.02.2020.docx	CGG20220000251-256	
1144	Amendment I to the Master Solution Ppurchase and Services Agreement between Dominion Voting Systems, Inc. and The Secretary of State of the State of Georgia	CGG20220000257-261	
1145	Email from Marilyn Marks to Cathy Latham re: FW: "Emergency" Rule for mandatory early scanning of ballots	CGG20220000262-63	

Exhibit No	Document Description	Document Type	Objections
1146	Email from Marilyn Marks to welch47@protonmail.com ; Cathy Latham; Pam Ausman re: FW: You Make the Laws. I'll Make ther Rules!"	CGG20220000264-265	
1147	Email from Marilyn Marks to Cathy Latham and Ed Volyles re: Authority of County boards to use hand marked paper ballots	CGG20220000266	
1148	Report/Presentation: When using BMDs "Wholly Or in Part is Not Practicable"	CGG20220000267-271	
1149	Correspondence from Brown to Cheryl Ringer dated 10.03.2020 re: Fulton County Board of Elections' Ongoing Violations of State law	CGG20220000272-276	
1150	Article - Georgia's US Senate Runoff Races at Risk - A Modest Proposal for a Defensible Vote Count	CGG20220000277-290	
1151	Email from Marilyn Marks dated 07.12.2021 to Cathy Latham re: FW: Essential new report in BMD court case against SOS	CGG20220000291	
1152	Expert Report of Andrew W. Appel dated 6.28.2021	CGG20220000292-323	
1153	Rule 5.4 Certificate of Service of Discovery (Expert Report of Appel	CGG20220000324-325	

Exhibit No	Document Description	Document Type	Objections
	and Halderman)dated 07.01.2021		
1154	Email from Marilyn Marks dated 08.03.2021 re: FW: Excellent Experts' reports served tonight - All public information	CGG20220000326	
1155	REBUTTAL REPORT OF ANDREW W. APPEL (July 30, 2021)	CGG20220000327-337	
1156	Declaration of J. Alex Halderman dated 08.02.2021	CGG20220000338-361	
1157	Eighth Declaration of Philip B. Stark dated 08.02.2021	CGG20220000362-405	
1158	Email from Marilyn Marks to Cathy Latham dated 08.03.2021 re: FW: Facing Critical Decisions on Upcoming Municipal Elections	CGG20220000406-407	
1159	Email from Marilyn Marks to Cathy Latham re: FW: Halderman report Update	CGG20220000408	
1160	Exhibit A to Halderman report	CGG20220000409-419	
1161	Transcript of Motions hearing Proceedings Before the Honorable Amy Totenberg dated 11.19.2021	CGG20220000420-539	
1162	Curling Plainiffs' Reply in Support of Plaintiffs' Motion to Sever dated 11.15.2021	CGG20220000540-680	

Exhibit No	Document Description	Document Type	Objections
1163	Email from Marilyn Marks to Caty Lathat,cc: Ed Voyles re: Judhe Totenberg opinion re: BMD ballots and GA law	CGG20220000681-682	
1164	Opinion and Order dated 10.11.2020	CGG20220000683-829	
1165	Report - Georgia's US Senate Runoff Races at Risk - A Modest Proposal for a Defensible Vote Count	CGG20220000830-843	
1166	Email from Marilyn Marks to Cathy Latham dated 02.28.2021 re: FW: Previous letter re: demanding a475 million refund	CGG20220000844-847	
1167	Email from Marilyn Marks to Cathy Latham re: FW: Previous letter re: demanding \$75 million refund	CGG20220000848-851	
1168	Email from Marilyn Marksto Ed Voyles and Cathy Latham re: FW: Problems created by omnibus bills - and proposed solutions	CGG20220000852-853	
1169	Email from Marilyn Marks to Cathy Latham dated 07.30.2021 re" FW": Prof.Alex Halderman's sealed report is subject of discovery dispute heard on Monday	CGG20220000854-855	

Exhibit No	Document Description	Document Type	Objections
1170	Joint Discovery Statement Regarding Access to Plaintiffs' Expert Report and Unduly Burdensome Discovery dated 07.12.2021	CGG20220000856-905	
1171	Exhibit B to to Joint Disco Statement	CGG20220000906-912	
1172	Transcript of Telephone Conference Proceedings Before the Honorable Amy Totenberg dated 07.26.2021	CGG20220000913-998	
1173	Email from Rhonda J. Martin to welch47 and Cathy Latham re: FW: Proposed Changes to Proposed Rules 183-1-12-12 and 183-1-12-13	CGG20220000999	
1174	Martin Memo to State Election Board attaching revisions to Proposed Rules 183-1-12-12 and 183-1-12-13 Tabulating Results and Storage of Returns respectively	CGG20220001000-1009	
1175	Email from Marilyn Marks to Cathy Latham, Ed Voyles re: FW: Request to AJC for clarification - FW: Georgia braces for contentious fight over Senated runoff results	CGG20220001010-1014	
1176	Email from Marilyn Marks forwarding email from Moghimi, Madeline to Cathy Latham, Ed	CGG2022000101015	



Exhibit No	Document Description	Document Type	Objections
	Voyles, Misty Hampton re: FW: Request to make public comment HB531		
1177	Email from Marilyn Marks forwarding email to welch47; Cathy Latham dated 10.22.2021 re "October 28, 2021 re: FW: State Election Board Agenda.pdf	CGG2022000101016	
1178	Agenda State Election Board via Webinar (Office of Secretary of State) dated 10.28.2021 9:00 a.m.	CGG2022000101017	
1179	Email from Marilyn Marks dated 09.19.2021 forwarding to Cathy Latham re: FW: State Election Board Agenda - September 21, 2021	CGG2022000101018	
1180	Agenda State Election Board via Webinar (Office of Secretary of State) dated 09.21.2021 9:00 a.m.	CGG2022000101019-1021	
1181	Email from Marilyn Marks to Cathy Latham dated 09.19.2021 re: FW: State Election Board - Notice of Rules Posted for Public Comment	CGG202200010101022	
1182	State Election Board Notice of Proposed Rulemaking Revisions to Subject 183-1-12: Preparation for and	CGG202200010101023-1084	

Exhibit No	Document Description	Document Type	Objections
	Conduct of Primaries and Elections		
1183	State Election Board Notice of Proposed Rulemaking Revisions to Subject 183-1-14: Absentee Voting	CGG20220001085-1095	
1184	Email from Marilyn Marks to Cathy Latham and Ed Voyles dated 12.27.2020 re: Lets's discuss as alternative when we talk	CGG20220001096	
1185	Email from Marilyn Marks to Cathy Latham with cc to welch47@protonmail.com re: Marietta tapes	CGG20220001097	
1186	Email from Marilyn Marks to Cathy Latham dated 02.21.2021 re: BMDs do not meet the 2016 HB16 requirements	CGG20220001098-1099	
1187	Email from Marilyn Marks to Cathy Latham re: Dominion BMD voting system FW: Exerpts from Judge T's opinion and highlights of her opinion	CGG20220001100	
1188	Opinion and Order dated 10.11.2020	CGG20220001101-1247	
1189	Exhibit 5 Excerpts from 10.11.20 Ruling - Judge Amy Totenberg	CGG20220001248-1251	

Exhibit No	Document Description	Document Type	Objections
1190	Email from Marilyn Marks to Cathy Latham dated 08.05.2021 re: Dominion System "reexamination" attaching "Petition Recent annotated.pdf"	CGG20220001252	
1191	Correspondence from Marilyn Marks to The Honorable Brad Raffensperger requesting reexamination of the Dominion Voting System	CGG20220001253-1263	
1192	Email from Marilyn Marks to Ed Voyles, Cathy Latham dated 12.27.2020 re: Early opening of AB mail ballots	CGG20220001264-1265	
1193	Email from Marilyn Marks to Cathy Latham re: Excellent Experts' reports served tonight -- All public information	CGG20220001266	
1194	Email from Marilyn Marks to Caty Latham dated 12.26.2020 re: Lamar County GOP Chair	CGG20220001267	
1195	Email from Marilyn Marks dated 102.22.2021 to Cathy Latham, Pam Ausman, welch47@protonmail.com re: Marietta tapes	CGG20220001268-1269	
1196	Email to Cathy Latham dated 12.26.2020 re: My counties	CGG20220001270-1272	

Exhibit No	Document Description	Document Type	Objections
1197	Email from Marilyn Marks to Cathy Latham dated 08.14.2021 re: Replace the Dominion System Before the 2022 Primary   InsiderAdvantageGeorgia	CGG20220001273-1274	
1198	Email from marilyn Marks to Ed Voyles and Cathy Latham re: Secret ballot --FW: Election officials travel to Coffee County, Georgia to begin investigation   KDNL	CGG20220001275-1276	
1199	Email from Marilyn Marks to Cathy Latham dated 02.14.2021 with cc to Ed Voyles re: Tip of iceberg disclosure of tabulation and system problems	CGG20220001277	
1200	Email from Marilyn Marks to welch47@protonmail.com and Cathy Latham dated 10.20.2021 re previous meeting of SEB --FW: Comments on Proposed Rule making with attachments: "CGG Comments on Rulemaking 09.20.21.pdf"	CGG20220001278	
1201	Coalition of Good Governance's Summary Comments on Proposed Election Rules	CGG20220001279-1286	

Exhibit No	Document Description	Document Type	Objections
1202	Email from Marliyn Marks to Cathy Latham and Ed Voyles dated 02.14.2021 re: Redacted Experts Report filed with Court attachments: "2021-02-12 Halderman Redaction [dckt 1070_0]][1].pdf	CGG20220001287	
1203	Declaration of J. Alex Halderman dated 02.12.2021	CGG20220001288-1297	
1204	Email to Marilyn Marks dated 02.14.2021. Re: Tip of iceberg disclosure of tabulation and system problems; attaching: "Marks Declaration 20210212 CGG Doc. 1071 CGG Brief on Standing and Exhibits-2.pdf"	CGG20220001298	
1205	Supplemental Declaration of Marilyn Marks dated 02.12.2021	CGG20220001299-1330	
1206	Email from Marilyn Marks to Cathy Latham with cc to Ed Voyles dated 12.26.2020 re: Transcript of 11/23 Meeting re: Rough draft letter for Blackmon; attaching: "SEBSpecialMtg23Nov200_otter.ai partial edits.docx"	CGG20220001331	
1207	SEBSpecialMTg23Nov2020 (unofficial rough transcript) 11/23	CGG20220001332-1356	

Exhibit No	Document Description	Document Type	Objections
1208	Email from Marilyn Marks to Cathy Latham dated 10.21.2021 re: Update; attaching "Screen shot 2021-10-21 at 11.57.42 AM.png"	CGG20220001357	
1209	Highlighted excerpt obtained from Curling case teleconference 10.07.21 Topic -- SOS withholding discovery responses: highlights - "suspected and possibly actual compromises of components of the election system. We are on a public call. So I'm not going to get into specifics about that"	CGG20220001358	
1210	Email from Marilyn Marks to Cathy Latham and Ed Voyles dated 12.26.2020 re: What if Coffee County (and maybe other counties) led the way with two security measures?	CGG20220001359	
1211	Email from Marilyn Marks to Misty Hampton, Ed Voyles, and Cathy Latham dated 12.30.2020 re: You will find this iinteresting from our case; attaching: "809-3 Harri declaration.pdf"	CGG20220001360	
1212	Declaration of Harri Hursti dated 08.24.2020	CGG20220001361	



**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**ATTACHMENT E-1**

**PLAINTIFFS' DEPOSITION DESIGNATIONS  
DEFENDANTS' COUNTER-DESIGNATIONS  
PLAINTIFFS' OBJECTIONS TO DEFENDANTS' COUNTER-  
DESIGNATIONS**



Code	Plaintiffs' Objections to Defendants' Counter-designations
ARG	Lawyer Argument or Colloquy. Plaintiffs object to this deposition designation because it is lawyer argument and not testimony of the witness.
CM	Cumulative. Plaintiffs object to this deposition designation on the ground that it is duplicative and/or cumulative of other designations.
F	Foundation. Plaintiffs object to this deposition designation on the ground that the foundation necessary for its admission has not been laid. (Fed. R. Evid. 602)
H	Hearsay. Plaintiffs object to this deposition designation because it constitutes or contains hearsay. (Fed. R. Evid. 801-802)
I	Incomplete. Plaintiffs object to this deposition designation because it does not contain the complete testimony. (Fed. R. Evid. 106) Plaintiffs generally objects to all designations that include only part of a question and/or part of an answer, or that do not include any question.
NR	Not Relevant. Plaintiffs object to this deposition designation because it is not relevant to any issue to be decided in this case. (Fed. R. Evid. 401-402)
LO	Lay Opinion. Plaintiffs object to this deposition designation because it constitutes or contains improper opinion by a lay witness. (Fed. R. Evid. 701-702)
NRT	Non-Responsive Testimony. Plaintiffs object to this deposition designation because it includes statements that are not responsive to the question asked.
S	Speculative. Plaintiffs object to this deposition designation because it includes statements that are speculative as to matters of fact or law.
SCOPE	Beyond Scope of Affirmative Designation. Plaintiffs object to this counter designation because it is beyond the scope of the original, affirmative deposition designation.
403	FRE 403. Plaintiffs object to this deposition designation because any probative value it has is substantially outweighed by a danger of one or more of the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. (Fed. R. Evid. 403)
VA	Vague and Ambiguous. Plaintiffs object to this deposition designation because it includes vague and indefinite statements.
P	Privilege Objection. Plaintiffs object to this designation because it includes privilege objections or attempts to solicit privileged information.
L	Leading. Plaintiffs object as an improper leading question.
COM	Compound. The question is compound and thus not clear which question the deponent is answering.
BE	Best Evidence. Plaintiffs object to this question because it asks a witness to testify about the contents of an original writing, recording, or photograph where the original is available. (FRE 1002)
LEGAL	Plaintiffs object to this question because it calls for a legal conclusion.

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
6:1 - 6:10	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
7:7 - 7:14	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
9:25 - 10:17	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
12:11 - 12:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
13:12 - 14:14	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the	14:15 - 14:24	

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	fact is not of consequence in determining the case, F.R.E. 401.		
16:1 - 16:6			
17:17 - 18:9	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
18:19 - 19:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
21:19 - 26:9	The cited portion reflects an incomplete answer, F.R.E. 106.	20:21 - 21:18 26:10	ARG; NR
28:8 - 28:15			
38:7 - 38:10			
38:21 - 39:10	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	38:11 - 38:20 39:11 - 39:13	NR

## EXHIBIT 5

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
39:14 - 39:25			
41:6 - 42:22	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401. Lack of foundation/speculation. F.R.E. 602.		
45:3 - 45:22	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
46:8 - 46:17	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	46:18 - 48:14	CM; 403
52:16 - 54:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401;		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
	further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
58:2 - 60:2	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602. Designated testimony contains hearsay, F.R.E. 802		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
64:1 - 65:15	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602. Designated testimony contains hearsay, F.R.E. 802		
69:11 - 69:18	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing,	69:7 - 69:10	I

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
70:9 - 70:16	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
71:4 - 72:7	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
73:2 - 75:9	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	72:23 - 73:1	
75:10 - 76:3	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial,	76:4 - 76:21	I



<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
76:22 - 77:15			
78:7 - 78:15	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	77:17 - 78:2	NRT
82:4 - 83:7		84:20 - 85:7 88:17 - 88:22	SCOPE
95:4 - 95:9	Legal conclusion		
95:15 - 95:23			

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
96:5 - 96:24	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602; improper/unsupported opinion testimony, F.R.E. 701.		
97:18 - 98:1	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial,	98:2 - 98:18	

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	confusing, distracting, or a waste of time, F.R.E. 403.		
99:5 - 99:24	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
104:8 - 104:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial,	103:13 - 104:7	CM

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
	confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designation is lawyer argument and not testimony of the witness.		
104:23 - 105:13	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designation is lawyer argument and not testimony of the witness.		
105:23 - 106:2	The cited portion reflects an incomplete answer,		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
	F.R.E. 106. Lack of foundation, F.R.E. 602; designation is lawyer argument and not testimony of the witness.		
106:4 - 106:12	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designation is lawyer argument and not testimony of the witness.		
106:13 - 109:9	Portions of designation is lawyer argument and debate; lack of foundation, F.R.E. 602; designated		

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	testimony contains hearsay, F.R.E. 802		
109:16 - 112:11	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designated testimony contains hearsay, F.R.E. 802; portions of the designation is lawyer argument/testimony and not testimony of the witness.		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
112:16 - 113:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602.	153:16 - 154:7155:6 - 155:21	COM; LO; F
113:23 - 114:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial,		

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602.		
117:17 - 117:20	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
118:9 - 118:12	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a	118:13 - 118:22	



## EXHIBIT 5

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
	waste of time, F.R.E. 403.		
118:25 - 119:16	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; compound question and argumentative.	119:17 - 120:1	
120:2 - 121:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be		

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; compound questions and attorney testimony		
121:23 - 122:2	The cited portion does not contain any question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
122:17 - 122:21	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its	122:3 - 122:16	F; COM

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; argumentative attorney testimony.		
124:8 - 124:12	The cited portion contains only a question and no witness testimony. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; compound question and argumentative		
124:14 - 124:18	The cited portion contains only an answer and no question. No tendency to make any fact more or less	123:7 - 124:7 124:19 - 126:3	COM; 403; S

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
126:9 - 126:25	Designated testimony contains hearsay, F.R.E. 802; designation contains compound question.	127:1 - 128:6 129:13 - 129:24	F; S
130:14 - 131:8	lack of foundation, F.R.E. 602; argumentative attorney testimony.	130:4 - 130:13	F; H; 403; CM
131:18 - 132:4	The cited portion omits the witness answer and contains a compound question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its		

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
	reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
132:6 - 132:7	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
132:8 - 132:18	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
132:21 - 132:22	The cited portion omits the question; testimony constitutes or contains improper opinion by a lay witness, F.R.E. 701-702.		
132:24 - 133:2	Exhibit that is the subject of the designation is not relevant and is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
133:19 - 134:15	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
	waste of time, F.R.E. 403.		
135:7 - 135:10	The cited portion contains only an answer and no question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
135:12 - 135:12	The cited portion omits the question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
	unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
135:13 - 136:12	The cited portion omits the witness's entire answer. The cited portion contains questions that are argumentative, misrepresent witness testimony, and call for a legal conclusion. The testimony does not tend to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		



James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
136:14 - 136:15	The cited portion omits the question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
136:16 - 136:22	The cited portion contains only the attorney question. The designation does not tend to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
136:25 - 137:5	The cited portion omits the question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	137:6 - 137:10	F; S
137:11 - 137:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	137:14 - 137:17	

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
137:18 - 138:11	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation, F.R.E. 602; designation contains hearsay, 802.		
146:14 - 148:21 151:20 - 152:7	Portions of designation lack foundation and are speculative, F.R.E. 602.	148:22 - 149:24 150:7 - 150:20 152:15 - 153:3	NR; 403; SCOPE
157:13 - 159:16	Portions of the designation are not relevant and call for speculation; F.R.E. 401, 602; designation contains incomplete answer.	153:16 - 154:7 155:6 - 155:21	SCOPE; LO; F
159:18 - 159:22	Designation does not contain question;	153:16 - 154:7 155:6 - 155:21	LO; F

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
159:25 - 166:1	Calls for speculation, F.R.E. 602; incomplete designation, omits answer;	152:15 - 153:3 153:16 - 154:7 155:6 - 155:21	SCOPE; F; LO
166:3 - 167:18	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3 153:16 - 154:7 155:6 - 155:21	SCOPE; F; LO
167:20 - 168:9	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3 153:16 - 154:7 155:6 - 155:21	SCOPE; F; LO

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
168:11 - 170:10	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3 153:16 - 154:7 155:6 - 155:21	SCOPE; F; LO
170:16 - 172:15		173:1 - 173:6	CM
173:23 - 175:3	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
175:16 - 176:10	Designation contains incomplete answer; F.R.E. 106; compound question and argumentative; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3 153:16 - 154:7 155:6 - 155:21	SCOPE; F; LO
176:12 - 177:3	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

James Barnes – July 20, 2022 Deposition Designations	Defendants’ Objections	Defendants’ Counter- Designations	Plaintiffs’ Counter Objections
178:5 - 178:8	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lacks foundation, F.R.E. 602.		
178:12 - 178:13	Designation lacks any question; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lacks foundation, F.R.E. 602.		

<b>James Barnes – July 20, 2022 Deposition Designations</b>	<b>Defendants’ Objections</b>	<b>Defendants’ Counter- Designations</b>	<b>Plaintiffs’ Counter Objections</b>
178:15 - 178:20	Lack of foundation, F.R.E. 602.		
186:18 - 187:1			
191:23 - 192:16		198:17 - 199:4	S
193:25 - 195:13	Lack of foundations/specula tion, F.R.E. 602.	198:17 - 199:4	S
195:14 - 197:11		198:17 - 199:4	S
208:20 - 209:20			
234:4 - 234:8	Lack of foundations/specula tion, F.R.E. 602; incomplete designation, F.R.E. 106	215:7 - 215:14	
234:10 - 234:15	Lack of foundations/specula tion, F.R.E. 602; incomplete designation, F.R.E. 106	215:7 - 215:14	

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
8:13 - 8:15			
13:20 - 14:3			
17:25 - 18:18	FRE 701 -object to the extent offered as a legal conclusion		



<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	concerning Board duties		
28:14 - 29:3	Irrelevant FRE 401; Fifth Amendment Privilege		
29:4 - 29:15	Irrelevant FRE 401		
30:7 - 30:16	Irrelevant FRE 401		
30:20 - 31:2	Irrelevant FRE 401; Fifth Amendment Privilege		
31:18 - 31:19	Irrelevant FRE 401; Fifth Amendment Privilege		
34:11 - 34:18			
35:1 - 37:25	Fifth Amendment; Hearsay, document speaks for itself;		
38:1 - 38:2	Question of counsel is not admissible testimony		
38:4 - 38:4	Fifth Amendment		
38:6 - 38:18	Fifth Amendment; Hearsay, document speaks for itself;		
39:9 - 40:13	Fifth Amendment; Hearsay,		

## EXHIBIT 5

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	document speaks for itself;		
44:11 - 44:16			
45:18 - 46:19			
46:23 - 46:24	Question of counsel is not admissible testimony		
47:4 - 47:4	Fifth Amendment; Hearsay, document speaks for itself; Incomplete use of document FRE 106		
47:6 - 47:14	Fifth Amendment		
48:23 - 49:1	Fifth Amendment; Hearsay, document speaks for itself; Incomplete exchange FRE 106	49:02:00	
52:9 - 52:18	Irrelevant 401	52:19-52:6	NR
53:7 - 53:10	Irrelevant 401	53:13-14	CM; NR
53:25 - 54:25	Irrelevant 401		
55:1 - 56:1	Fifth Amendment; Irrelevant 401		
56:13 - 56:22	Fifth Amendment; Irrelevant 401		

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
56:24 - 57:13	Fifth Amendment; Irrelevant 401	57:14-58:6	SCOPE; S
58:7 - 58:15	Fifth Amendment; Irrelevant 401		
58:18 - 58:18	Fifth Amendment; Irrelevant 401		
59:18 - 59:19	Irrelevant 401	59:20-59:24	NR; S
59:25 - 63:10	Fifth Amendment; Irrelevant 401; Hearsay, document speaks for itself; incomplete document FRE 106; lack of foundation, FRE 602		
64:9 - 64:18		64:19-65:09	ARG; NR
66:6 - 66:18		66:19-22	ARG; NR
66:23 - 68:23	Fifth Amendment		
70:22 - 71:12		71:13-16	ARG; NR
71:17 - 73:25	Irrelevant FRE 401		
74:4 - 74:11	Irrelevant FRE 401; Hearsay	74:12:00	ARG; NR
74:13 - 74:21	Irrelevant FRE 401; Hearsay	74:22-25	ARG; NR
75:1 - 76:10	Irrelevant FRE 401; Hearsay	76:11:00	ARG; NR
76:14 - 76:19	Irrelevant FRE 401; Hearsay	76:20:00	ARG; NR

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
76:22 - 76:22	Testimony of counsel is not admissible evidence		
76:25 - 77:10	Irrelevant 401		
77:23 - 78:3	Irrelevant FRE 401; Hearsay	78:4-7	ARG; NR
78:8 - 78:9	Irrelevant FRE 401; Hearsay		
81:2 - 81:10	Irrelevant FRE 401;		
88:24 - 89:4			
91:3 - 92:6	Irrelevant FRE 401; Fifth Amendment	92:07:00	ARG; NR
92:8 - 94:25	Irrelevant FRE 401; Fifth Amendment; Hearsay		
95:1 - 95:16	Irrelevant FRE 401		
95:18 - 96:8	Fifth Amendment		
96:10 - 96:24	Fifth Amendment		
96:25 - 97:25	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
98:2 - 98:20	Fifth Amendment		
98:23 - 99:4	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
99:7 - 99:10	Fifth Amendment		
99:9 - 99:10	Fifth Amendment		

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
99:13 - 99:19	Fifth Amendment		
99:21 - 101:2	Fifth Amendment		
101:5 - 101:12	Fifth Amendment		
101:13 - 101:15			
102:5 - 103:14	Fifth Amendment		
103:16 - 103:16	Fifth Amendment; and the cited portion reflects an incomplete statement.		
103:18 - 106:5	Fifth Amendment		
106:7 - 106:7	Fifth Amendment		
106:17 - 108:1	Fifth Amendment		
109:9 - 109:15			
109:22 - 115:14	Fifth Amendment		
115:17 - 115:18			
116:9 - 117:18	Fifth Amendment		
117:20 - 119:25	Fifth Amendment; and the cited portion reflects an incomplete statement.		
120:1 - 120:11	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a		

## EXHIBIT 5

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	waste of time, F.R.E. 403.		
120:13 - 121:20	Fifth Amendment; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
121:22 - 122:25	Fifth Amendment		
123:1 - 124:11	Fifth Amendment		
124:13 - 124:13	Fifth Amendment		
124:15 - 124:17	Fifth Amendment		
125:4 - 125:18	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time,		

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
125:20 - 126:11	Fifth Amendment		
126:13 - 127:3	Fifth Amendment		
127:7 - 128:7	Fifth Amendment		
128:10 - 128:14	Fifth Amendment; and the cited portion reflects an incomplete statement.		
128:16 - 129:3	Fifth Amendment		
129:6 - 129:17	Fifth Amendment; and the cited portion reflects an incomplete statement.		
129:20 - 129:25	Fifth Amendment		
130:11 - 130:18	Fifth Amendment; and the cited portion reflects an incomplete statement.		
130:20 - 131:23	Fifth Amendment		
132:1 - 132:10	Fifth Amendment; and the cited portion reflects an		

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	incomplete statement.		
132:12 - 133:10	Fifth Amendment; and the cited portion reflects an incomplete statement.		
133:12 - 133:12	Fifth Amendment		
133:14 - 133:21	Fifth Amendment; and the cited portion reflects an incomplete statement.		
133:23 - 134:5	Fifth Amendment; and the cited portion reflects an incomplete statement.		
134:7 - 134:7	Fifth Amendment		
134:9 - 134:20	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		



<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
134:22 - 135:1	Fifth Amendment; and the cited portion reflects an incomplete statement.		
135:3 - 135:20	Fifth Amendment; and the cited portion reflects an incomplete statement.		
135:22 - 137:8	Fifth Amendment		
137:10 - 137:11			
144:14 - 144:20	Relevance, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
145:10 - 147:4	Fifth Amendment		
147:13 - 148:11	Fifth Amendment		
148:14 - 149:11	Fifth Amendment; and the cited portion reflects an incomplete statement.		
149:13 - 151:2	Hearsay, FRE 802; lack of authentication, FRE 901;		

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	irrelevant, FRE 401; Fifth Amendment privilege		
151:5 - 152:25	Hearsay, FRE 802; lack of authentication, FRE 901; irrelevant, FRE 401; calls for speculation, FRE 602; Fifth Amendment privilege		
153:2 - 153:5	Irrelevant, FRE 401; Fifth Amendment privilege		
153:7 - 154:1	Hearsay, FRE 802; lack of authentication, FRE 901; irrelevant, FRE 401; Fifth Amendment privilege		
154:3 - 154:25	Hearsay, FRE 802; lack of authentication, FRE 901; irrelevant, FRE 401; Fifth Amendment privilege		
155:7 - 155:14	Irrelevant, FRE 401; Fifth Amendment		

## EXHIBIT 5

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	privilege; assumes facts not in evidence		
155:17 - 156:21	Hearsay, FRE 802; lack of authentication, FRE 901; irrelevant, FRE 401; Fifth Amendment privilege		
156:23 - 157:17	Hearsay, FRE 802; lack of authentication, FRE 901; irrelevant, FRE 401; Fifth Amendment privilege		
157:19 - 157:24	Hearsay, FRE 802; lack of authentication, FRE 901; irrelevant, FRE 401; Fifth Amendment privilege		
158:1 - 158:19	Irrelevant, FRE 401; Fifth Amendment privilege		
158:22 - 158:24	Irrelevant, FRE 401; Fifth Amendment privilege; argumentative, FRE 403, 611		

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
159:11 - 159:15	Irrelevant, FRE 401; Fifth Amendment privilege		
159:17 - 159:17	Irrelevant, FRE 401; Fifth Amendment privilege		
162:20 - 163:11	Irrelevant, FRE 401; improper argument by counsel		
164:4 - 164:9	Irrelevant, FRE 401		
165:3 - 165:8	Irrelevant, FRE 401		
165:11 - 166:25	Hearsay, FRE 802; irrelevant, FRE 401		
167:1 - 167:11	Irrelevant, FRE 401		
167:13 - 167:18	Irrelevant, FRE 401		
171:5 - 171:6	Irrelevant, FRE 401; lack of authentication, FRE 901; not actually testimony		
173:3 - 173:7	Fifth Amendment privilege; compound question, FRE 403, 611; calls for speculation, FRE 602; irrelevant, FRE 401		

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
173:9 - 173:17	Hearsay, FRE 802; lack of authentication, FRE 901; irrelevant, FRE 401; Fifth Amendment privilege		
180:3 - 180:21	Fifth Amendment privilege		
180:23 - 181:8	Fifth Amendment privilege		
182:9 - 182:14	Lack of authentication, FRE 901; irrelevant, FRE 401; not actually testimony		
182:15 - 183:5	Irrelevant, FRE 401; Fifth Amendment privilege		
183:8 - 183:11	Irrelevant, FRE 401; Fifth Amendment privilege; improper argument by counsel		
183:13 - 183:23	Irrelevant, FRE 401; Fifth Amendment privilege; improper argument by counsel		

<b>Eric Chaney – August 15, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
183:25 - 183:25	Irrelevant, FRE 401; Fifth Amendment privilege; improper argument by counsel; calls for speculation		
184:7 - 184:10	Irrelevant, FRE 401; Fifth Amendment privilege		
184:14 - 184:14	Irrelevant, FRE 401; Fifth Amendment privilege		
184:16 - 184:19	Irrelevant, FRE 401; Fifth Amendment privilege		
184:21 - 185:5	Irrelevant, FRE 401; Fifth Amendment privilege		

<b>Ben Cotton – August 25, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
13:8 - 13:13			
28:14 - 28:21	Irrelevant, FRE 401		

<b>Ben Cotton – August 25, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
69:15 - 72:15	Irrelevant, FRE 401; calls for speculation, FRE 602; confusing question, FRE 403, 611		
72:21 - 73:1	Irrelevant, FRE 401; calls for speculation, FRE 602; incomplete testimony, FRCP 32(a)(6)	73:7-8	I; VA
73:7 - 74:19	Irrelevant, FRE 401		
74:20 - 75:11	Irrelevant, FRE 401		
81:17 - 82:4	Irrelevant, FRE 401		
82:8 - 83:22	Irrelevant, FRE 401		
84:7 - 85:9	Irrelevant, FRE 401		
85:10 - 85:20	Irrelevant, FRE 401; lack of authentication, FRE 901		
86:17 - 87:10	Irrelevant, FRE 401		
87:14 - 88:2	Irrelevant, FRE 401		
88:7 - 89:11	Irrelevant, FRE 401		
89:17 - 90:13	Irrelevant, FRE 401		

<b>Ben Cotton – August 25, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
93:8 - 94:10	Irrelevant, FRE 401; lack of authentication, FRE 901		
99:9 - 100:19	Irrelevant, FRE 401; lack of authentication, FRE 901	94:8-10	CM; NR
105:19 - 105:21	Irrelevant, FRE 401		
106:3 - 106:6	Irrelevant, FRE 401		
122:5 - 122:10	Irrelevant, FRE 401; incomplete testimony, FRCP 32(a)(6)	105:5-106:6	ARG, CM
122:15 - 123:7	Irrelevant, FRE 401		
123:11 - 123:12	Irrelevant, FRE 401		
123:19 - 124:21	Irrelevant, FRE 401; incomplete testimony, FRCP 32(a)(6)	124:22-8	ARG, CM
125:9 - 126:9	Irrelevant, FRE 401		
126:21 - 127:5	Irrelevant, FRE 401		
127:10 - 128:15	Irrelevant, FRE 401		
130:9 - 130:11	Irrelevant, FRE 401; lack of foundation, FRE 602	105:5-106:6	ARG, CM



<b>Ben Cotton – August 25, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
131:15 - 134:8	Irrelevant, FRE 401; lack of authentication, FRE 901		
134:19 - 138:17	Irrelevant, FRE 401		
139:15 - 140:2	Irrelevant, FRE 401		
140:13 - 140:22	Irrelevant, FRE 401		
141:12 - 141:18	Irrelevant, FRE 401		
142:2 - 142:4	Irrelevant, FRE 401		
143:18 - 144:2	Irrelevant, FRE 401		
144:8 - 144:11	Irrelevant, FRE 401		
144:12 - 145:5	Irrelevant, FRE 401		
145:12 - 146:1	Irrelevant, FRE 401		
148:13 - 148:19	Irrelevant, FRE 401; incomplete testimony, FRCP 32(a)(6)	148:20-149:3	
149:4 - 149:6	Irrelevant, FRE 401		
149:11 - 149:18	Irrelevant, FRE 401		
160:20 - 160:21	Irrelevant, FRE 401; lack of authentication, FRE 901		

<b>Ben Cotton – August 25, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
161:6 - 161:21	Irrelevant, FRE 401; lack of authentication, FRE 901		
162:9 - 162:15	Irrelevant, FRE 401; lack of authentication, FRE 901; improper opinion testimony, FRE 702, FRCP 26		
171:12 - 171:15	Irrelevant, FRE 401; compound question, FRE 403, 611		
171:20 - 172:5	Irrelevant, FRE 401; compound question, FRE 403, 611		
172:17 - 173:5	Irrelevant, FRE 401; lack of authentication, FRE 901; incomplete testimony, FRCP 32(a)(6)	105:5-106:6	ARG, CM
177:2 - 179:8	Irrelevant, FRE 401		
185:18 - 186:13	Irrelevant, FRE 401; lack of authentication, FRE 901; incomplete testimony, FRCP 32(a)(6)	105:5-106:6	ARG, CM

<b>Ben Cotton – August 25, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
210:21 - 211:1	Irrelevant, FRE 401; compound question, FRE 403, 611; calls for speculation, FRE 602		
211:4 - 212:7	Irrelevant, FRE 401; compound question, FRE 403, 611; calls for speculation, FRE 602		
212:8 - 212:12	Irrelevant, FRE 401; compound question, FRE 403, 611		
212:18 - 213:1	Irrelevant, FRE 401		

<b>Alex Cruce – November 22, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
8:18 - 8:20			
10:6 - 10:10			
16:6 - 16:10	Irrelevant, FRE 401		
16:13 - 16:17	Irrelevant, FRE 401		
20:20 - 21:1	Irrelevant, FRE 401		
44:20 - 45:8	Irrelevant, FRE 401; compound		

<b>Alex Cruce – November 22, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	question, FRE 403, 611		
46:4 - 46:16	Irrelevant, FRE 401		
51:2 - 51:22	Irrelevant, FRE 401		
52:1 - 52:22	Irrelevant, FRE 401		
53:1 - 55:13	Irrelevant, FRE 401		
56:12 - 58:2	Irrelevant, FRE 401		
59:9 - 59:12	Irrelevant, FRE 401; incomplete testimony, FRCP 32(a)(6)	59:14-60:11	I, CM, H
60:2 - 60:5	Irrelevant, FRE 401		
60:12 - 60:20	Irrelevant, FRE 401; incomplete testimony, FRCP 32(a)(6)	60:21-14	H, F
64:20 - 65:19	Irrelevant, FRE 401		
65:20 - 66:20	Irrelevant, FRE 401		
68:21 - 69:21	FRE 602: Speculation; FRE 801: Hearsay		
70:9 - 71:21	FRE 802: Hearsay		
72:4 - 72:10			
73:4 - 73:8			
75:20 - 76:19			

<b>Alex Cruce – November 22, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
79:14 - 80:20			
81:14 - 82:2			
82:14 - 82:20			
83:7 - 83:22			
84:1 - 85:22	FRE 602: Speculation; FRE 801: Hearsay		
86:1 - 86:13			
88:1 - 98:10	FRE 602: Speculation; FRE 802: Hearsay; lack of foundation		
106:19 - 109:16	FRE 602: Speculation; FRE 802: Hearsay		
115:21 - 117:17			
117:18 - 119:19			
120:18 - 121:17			
134:14 - 134:22			
135:1 - 135:22	FRE 602: Speculation; FRE 802: Hearsay		
136:1 - 138:21	FRE 402: Irrelevant; lack of foundation		
139:7 - 141:22	FRE 802: Hearsay		
142:22 - 144:2	FRE 802: Hearsay		
144:15 - 147:20	FRE 602: Speculation		

<b>Alex Cruce – November 22, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
150:2 - 150:20	FRE 802: Hearsay		
152:5 - 154:19	FRE 802: Hearsay		
154:20 - 157:10	FRE 602: Speculation		
175:4 - 176:4			
180:12 - 180:15			
180:19 - 181:4	FRE 802: Hearsay		
181:8 - 181:14			
182:16 - 183:17	FRE 602: Speculation		
192:22 - 194:6			

<b>Dean Felicetti – September 2, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>
10:4 - 10:18		
14:15 - 14:18		
15:4 - 15:5		
15:13 - 16:8		
18:19 - 19:4		
22:22 - 23:7		
23:17 - 24:10		
24:22 - 25:11		
25:15 - 26:1		
26:13 - 26:18		
26:19 - 26:22		
27:10 - 27:16		
27:20 - 28:14		
28:17 - 29:7		
29:15 - 29:21		

<b>Dean Felicetti – September 2, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>
30:3 - 30:16		
30:17 - 31:4		
32:10 - 33:11		
33:20 - 34:8		
34:9 - 34:10		
34:22 - 35:1		
35:7 - 35:18		
36:4 - 36:12		
36:19 - 37:13		
38:2 - 38:5		
38:14 - 38:19	FRE 403 & 611(a): Vague	
38:20 - 39:4		
40:10 - 42:13		
43:6 - 46:5	FRE 701: Improper lay opinion testimony	
46:19 - 47:5	FRE 701: Improper lay opinion testimony; Lack of foundation	
48:1 - 48:8		
50:13 - 50:18		
51:1 - 51:6		
52:6 - 52:19		
53:15 - 55:10		
55:15 - 55:19		
56:11 - 57:9		
58:1 - 58:9		
58:18 - 59:1		
59:18 - 60:2		
60:12 - 60:21		
62:12 - 62:21		
63:14 - 63:19		
64:1 - 64:3		
66:12 - 66:19	FRE 403 & 611(a): Vague	

<b>Dean Felicetti – September 2, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>
67:18 - 69:1	FRE 403 & 611(a): Incomplete	
69:20 - 70:2		
70:3 - 70:9		
71:3 - 72:21		
73:13 - 73:22	FRE 701: Improper lay opinion testimony	
75:3 - 75:6		
75:7 - 75:16	FRE 701: Improper lay opinion testimony	
78:1 - 78:12		
78:17 - 79:2		
79:12 - 81:8	FRE 402: Irrelevant	
86:5 - 86:16		
103:6 - 103:22		
107:3 - 108:2	FRE 802: Hearsay	
111:1 - 111:9		
112:5 - 112:9		
112:19 - 113:6		
113:9 - 113:17		
114:3 - 116:17	FRE 802: Hearsay	
116:19 - 117:11	FRE 802: Hearsay	
117:19 - 118:1		
118:17 - 118:22		
119:4 - 119:15		
125:11 - 128:5		
130:14 - 131:5		
139:15 - 140:14	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
141:2 - 141:10	FRE 401 - Not relevant; FRE 602 - Lack of	



<b>Dean Felicetti – September 2, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>
	foundation/speculation	
141:12 - 142:9	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation; FRE 701 - Legal conclusion	
142:15 - 143:12	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
143:15 - 145:5	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
145:12 - 147:5	FRE 401 - not relevant; FRE 602 - Lack of foundation/speculation; FRE 801 - Hearsay	
154:17 - 155:9	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
157:2 - 157:19	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
165:15 - 165:19	FRE 401 - not relevant; FRE 602 - Lack of foundation/speculation	

<b>Dean Felicetti – September 2, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>
	n; The excerpted testimony is vague and ambiguous	
166:3 - 169:19	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
172:14 - 172:18	FRE 401 - Not relevant	
173:1 - 174:19	FRE 401 - Not relevant	
176:12 - 177:12	FRE 401 - Not relevant	
183:11 - 184:11	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
189:3 - 189:11	FRE 401 - Not relevant	
191:2 - 191:11	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
200:16 - 203:10	FRE 401 - Not relevant	
214:8 - 215:12	FRE 401 - Not relevant	
215:22 - 216:18	FRE 401 - Not relevant	
218:22 - 219:9	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	

<b>Dean Felicetti – September 2, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>
219:19 - 225:3	FRE 401 - Not relevant	
226:11 - 227:2	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
228:4 - 230:15	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
234:6 - 234:10	FRE 401 - Not relevant	
234:14 - 235:18	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
240:5 - 240:13	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	
241:15 - 243:8	FRE 401 - Not relevant	
243:15 - 245:11	FRE 401 - Not relevant	
255:7 - 257:17	FRE 401 - Not relevant	
264:8 - 264:16	FRE 401 - Not relevant	
288:3 - 288:13	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation	

<b>Dean Felicetti – September 2, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>
290:2 - 291:3	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation; FRE 801 - Hearsay	
291:13 - 291:18	FRE 401 - Not relevant	
295:17 - 296:2	FRE 401 - Not relevant; Contains no witness testimony - is Mr. Cross marking Exhibit 28 on the record.	
301:16 - 302:12	FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculation; FRE 701 - Contains impermissible opinion testimony	

<b>Derrick Gilstrap – January 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
7:1 - 7:4			
11:5 - 11:19			
12:1 - 12:7			
15:9 - 15:25			
16:1 - 16:25			

<b>Derrick Gilstrap – January 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
17:1 - 17:22	17:1 - 17:3- The citation is an incomplete portion of the question, FRE 106; 17:4- 25: FRE 602 – lack of foundation, speculation; Seeks a legal conclusion F.R.E. 701; Seeks opinion on ultimate issue F.R.E. 704.		
19:20 - 19:23	FRE 602 – lack of foundation, speculation; Seeks opinion on ultimate issue F.R.E. 704		
24:20 - 25:2	FRE 602 – lack of foundation, speculation; Seeks opinion on ultimate issue F.R.E. 704		
25:11 - 25:16	Relevance, F.R.E. 401		

<b>Derrick Gilstrap – January 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
26:20 - 26:23	FRE 602 – lack of foundation, speculation; Seeks a legal conclusion F.R.E. 701; Seeks opinion on ultimate issue F.R.E. 704.	17:4- 25	CM, I
27:21 - 27:25	Relevance, F.R.E. 401.		
28:1 - 28:25	FRE 602 – lack of foundation, speculation; Seeks opinion on ultimate issue F.R.E. 704.		
29:1 - 29:4	The citation is an incomplete portion of the question, FRE 106.		
35:21 - 35:25	The citation is an incomplete portion of the question, FRE 106.		
36:1 - 36:18	The citation is an incomplete		

<b>Derrick Gilstrap – January 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	portion of the question, FRE 106.		
37:3 - 37:6	The citation is an incomplete portion of the question, FRE 106; FRE 602 – lack of foundation, speculation; Seeks opinion on ultimate issue F.R.E. 704.		
61:12 - 61:25	The citation is an incomplete portion of the question, FRE 106; FRE 602 – lack of foundation, speculation; hearsay FRE 801.		
62:1 - 62:7	The citation is an incomplete portion of the question, FRE 106; Seeks a legal		

<b>Derrick Gilstrap – January 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	conclusion. F.R.E. 701.		
65:5 - 65:13	The citation is an incomplete portion of the question, FRE 106.		
68:12 - 68:15	The citation is an incomplete portion of the question. FRE 106; Lack of foundation, speculation. F.R.E. 602.		
68:20 - 68:25	The citation is an incomplete portion of the question. FRE 106.		
69:1 - 69:2	The citation is an incomplete portion of the question. FRE 106.		
72:3 - 72:11	Seeks a legal conclusion. F.R.E. 701.		
90:14 - 90:25	Lack of foundation,		



<b>Derrick Gilstrap – January 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	speculation. F.R.E. 602.		
92:4 - 92:7	FRE 602 – lack of foundation, speculation; Seeks a legal conclusion F.R.E. 701.		
100:10 - 100:20	FRE 602 – lack of foundation, speculation; Seeks a legal conclusion F.R.E. 701.		
101:19 - 102:4	The citation is an incomplete portion of the question, FRE 106.		
120:3 - 120:8	FRE 602 – lack of foundation, speculation; Seeks a legal conclusion F.R.E. 701.		
122:23 - 123:8	FRE 602 – lack of foundation, speculation.		
135:22 - 136:15	FRE 602 – lack of foundation,		

<b>Derrick Gilstrap – January 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	speculation; Seeks impermissibl e opinion testimony F.R.E. 701.		
138:7 - 138:16	Relevance, F.R.E. 401.		
138:18 - 139:25	The citation is an incomplete portion of the question, FRE 106; Relevance, F.R.E. 401.		
140:1 - 140:25	The citation is an incomplete portion of the question, FRE 106; FRE 602 – lack of foundation, speculation; hearsay FRE 801.		
141:1 - 141:25	The citation is an incomplete portion of the question, FRE 106; FRE 602 – lack of		

<b>Derrick Gilstrap – January 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	foundation, speculation; hearsay FRE 801.		
142:1 - 142:4	The citation is an incomplete portion of the question, FRE 106; FRE 602 – lack of foundation, speculation; Seeks a legal conclusion F.R.E. 701.		

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
11:17 - 11:19	Relevance, F.R.E. 401.		
16:8 - 16:10			
16:21 - 17:3			
18:7 - 19:17	Seeks opinion on ultimate issue F.R.E. 704.		
22:17 - 22:20	Relevance, F.R.E. 401.		

## EXHIBIT 5

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
23:3 - 24:8	The citation is an incomplete portion of the question, FRE 106; FRE 602 – lack of foundation, speculation; hearsay FRE 801.		
28:14 - 28:21	Seeks impermissible opinion testimony F.R.E.; Seeks a legal conclusion F.R.E. 701.		
29:2 - 29:3	The citation is an incomplete portion of the question, FRE 106; Relevance, F.R.E. 401.		
29:5 - 29:18	Seeks opinion on ultimate issue F.R.E. 704.		
30:21 - 31:9	Hearsay FRE 801.		
33:16 - 34:13	Relevance, F.R.E. 401.		

## EXHIBIT 5

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
37:10 - 38:2	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	37:10 - 38:7	CM, ARG, H
38:5 - 38:13	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	37:10 - 38:14	CM, ARG, H
38:16 - 39:18	Relevance, F.R.E. 401. There is no context for this limited excerpt, FRE 106.		
40:4 - 40:5	Relevance, F.R.E. 401. There is no context for this limited excerpt, FRE 106.		
40:13 - 40:18	Relevance, F.R.E. 401.	40:13 - 40:21	CM, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
40:20 - 40:21	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	40:13 - 40:21	CM, ARG
49:22 - 51:2	Relevance, F.R.E. 401.		
51:3 - 51:3	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	51:3 - 51:5	CM, ARG
51:5 - 51:17	Relevance, F.R.E. 401. The cited portion reflects an incomplete	51:3 - 51:20	CM, ARG, I

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	exchange in the deposition, F.R.E. 106.		
51:20 - 52:4	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	51:3 - 52:7	CM, ARG, I
54:20 - 54:22	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	54:20 - 55:6	CM, ARG
55:5 - 55:6	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	54:20 - 55:6	CM, ARG
55:8 - 55:13	Relevance, F.R.E. 401.	55:8 - 55:15	CM, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
55:15 - 55:15	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	55:8 - 55:15	CM, ARG
56:1 - 56:9	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	56:1 - 56:11	CM, ARG
56:11 - 56:20	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the	56:1 - 56:22	CM, ARG



<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	deposition, F.R.E. 106.		
56:22 - 56:22	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	56:1 - 56:22	CM, ARG
57:2 - 57:5	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	57:2 - 57:8	CM, ARG
57:7 - 57:8	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	57:2 - 57:8	CM, ARG
57:10 - 57:18	Relevance, F.R.E. 401.		
58:7 - 59:2	Relevance, F.R.E. 401.		

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
59:16 - 60:17	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	59:16 - 60:19	CM, ARG
60:21 - 60:21	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	60:21 - 61:6	CM, ARG
61:1 - 61:5	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	60:21 - 61:6	CM, ARG
61:8 - 61:14	Relevance, F.R.E. 401. There is no context for this limited exchange		

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	excerpt, FRE 106.		
62:2 - 62:4	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
62:5 - 63:20	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	62:5 - 64:5	CM, I, ARG
63:22 - 65:3	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	62:5-65:6	CM, ARG, F
65:5 - 65:16	Relevance, F.R.E. 401. The cited portion reflects an incomplete	62:5-65:18	CM, ARG, F

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<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	exchange in the deposition, F.R.E. 106.		
65:18 - 66:4	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
66:5 - 66:9	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	66:5 - 67:16	CM, ARG, NR
66:11 - 67:8	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	66:11 - 67:16	CM, ARG, NR
67:14 - 67:20	Relevance, F.R.E. 401. The cited portion	66:11 - 67:22	CM, ARG, NR

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	reflects an incomplete exchange in the deposition, F.R.E. 106.		
67:22 - 68:3	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	66:11 - 68:6	CM, ARG, NR
68:8 - 68:11	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	68:8 - 69:4	CM, ARG, NRT
69:3 - 69:13	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	68:8 - 69:17	CM, ARG, NRT

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<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
69:17 - 69:17	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
69:19 - 70:3	Relevance, F.R.E. 401.		
70:4 - 71:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	70:4 - 71:3	CM, ARG
71:3 - 71:10	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	70:4 - 71:12	CM, ARG
71:12 - 72:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete	70:4 - 72:4	CM, ARG

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<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	exchange in the deposition, F.R.E. 106.		
72:3 - 72:10	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	70:4 - 72:10	CM, ARG
74:2 - 74:12	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	74:2 - 74:14	CM, ARG
74:14 - 74:21	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	74:2 - 74:21	CM, ARG
75:18 - 76:4	Relevance, F.R.E. 401.		

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
77:6 - 77:13	Relevance, F.R.E. 401.		
78:3 - 78:7	Relevance, F.R.E. 401.		
79:5 - 79:15	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	79:5 - 79:17	CM, ARG
79:17 - 79:20	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	79:5 - 79:20	CM, ARG
85:21 - 86:2	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	85:21 - 86:19	CM, F
86:6 - 86:19	Relevance, F.R.E. 401.	86:4-86:19	CM, F



## EXHIBIT 5

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
91:6 - 91:12	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	91:2-91:15	CM, F, I
91:17 - 92:3	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	91:2-91:15	CM, F, I
92:5 - 93:2	Relevance, F.R.E. 401. The cited portion reflects an incomplete statement, F.R.E. 106.	92:2-93:2	CM, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
93:3 - 93:20	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
96:17 - 97:6	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	96:17 - 97:20	CM, ARG
97:19 - 97:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	96:17 - 97:20	CM, ARG
99:19 - 101:10	Relevance, F.R.E. 401.		
101:18 - 102:9	Relevance, F.R.E. 401. The cited portion reflects an incomplete	101:19-102:12	CM, F

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	exchange in the deposition, F.R.E. 106.		
102:13 - 102:15	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	101:13-102:22	CM, ARG, I
102:19 - 102:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	102:2-102:22	CM, ARG
102:21 - 104:7	Relevance, F.R.E. 401. Lack of foundation/sp eculation, F.R.E. 602.		
104:12 - 104:14	Relevance, F.R.E. 401.		
108:10 - 108:17	Relevance, F.R.E. 401. Lack of foundation/sp		

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	eculation, F.R.E. 602.		
112:12 - 113:12	Relevance, F.R.E. 401.		
113:13 - 113:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	113:13 - 114:10	NR, ARG, CM
113:21 - 113:21	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	113:13 - 114:10	NR, ARG, CM
114:11 - 115:6	Hearsay, F.R.E. 802. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	114:11 - 115:19	CM, F, H

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Lack of foundation/speculation, F.R.E. 602.		
115:20 - 116:11	Hearsay, F.R.E. 802. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/speculation, F.R.E. 602.	115:20 - 116:22	CM, F
117:1 - 117:15	Hearsay, F.R.E. 802. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/speculation, F.R.E. 602.	117:1 - 118:8	CM, NR

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118:9 - 118:17	Hearsay, F.R.E. 802. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/sp eculation, F.R.E. 602.	117:1 - 118:19	CM, NR, ARG
118:19 - 119:14	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/sp eculation, F.R.E. 602.	118:19 - 120:2	NR, ARG, CM, F
119:21 - 120:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete	119:21 - 120:2	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	exchange in the deposition, F.R.E. 106.		
120:2 - 120:2	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	119:21 - 120:2	NR, ARG
121:2 - 121:4	Relevance, F.R.E. 401.		
121:22 - 122:7	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	121:22 - 123:22	NR, ARG, CM
122:14 - 122:18	Relevance, F.R.E. 401.		
124:5 - 124:11	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the	124:5 - 124:14	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	deposition, F.R.E. 106.		
124:13 - 124:14	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	124:5 - 124:14	NR, ARG
124:16 - 124:17	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	124:16-124:20	NR, ARG
124:19 - 124:20	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	124:16-124:20	NR, ARG
125:18 - 125:21	Relevance, F.R.E. 401. The cited portion	125:18 - 126:1	NR, ARG



<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	reflects an incomplete exchange in the deposition, F.R.E. 106.		
126:1 - 126:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	125:18 - 126:1	NR, ARG
126:9 - 127:16	Relevance, F.R.E. 401.		
141:19 - 142:10	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 143:21	NR, ARG
142:13 - 142:16	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the	141:19 - 143:21	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	deposition, F.R.E. 106.		
142:18 - 143:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 143:21	NR, ARG
143:10 - 143:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 143:21	NR, ARG
143:21 - 144:9	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 144:19	NR, ARG
144:12 - 144:16	Relevance, F.R.E. 401. The cited portion	141:19 - 144:19	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	reflects an incomplete exchange in the deposition, F.R.E. 106.		
144:19 - 146:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	144:12 - 146:1	NR, ARG
154:17 - 155:1	Relevance, F.R.E. 401.		
155:6 - 156:9	Relevance, F.R.E. 401.		
160:16 - 161:9	Relevance, F.R.E. 401.		
161:10 - 162:12	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	161:10 - 162:15	NR, ARG
162:14 - 162:15	Relevance, F.R.E. 401. The cited portion	161:10 - 162:15	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	reflects an incomplete exchange in the deposition, F.R.E. 106.		
162:17 - 162:19	Relevance, F.R.E. 401.		
164:2 - 164:3	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	164:2 - 164:6	NR, ARG
164:6 - 164:6	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	164:2 - 164:6	NR, ARG
164:8 - 164:16	Relevance, F.R.E. 401.		
164:19 - 164:21	Relevance, F.R.E. 401. The cited portion reflects an incomplete	164:19 - 165:1	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	exchange in the deposition, F.R.E. 106.		
165:1 - 165:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	164:19 - 165:1	NR, ARG
165:16 - 165:18	Relevance, F.R.E. 401.		
165:19 - 166:11	Relevance, F.R.E. 401.		
188:6 - 189:12	Relevance, F.R.E. 401.		
189:13 - 190:21	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	189:13 - 190:22	NR, ARG
193:15 - 194:1	Relevance, F.R.E. 401.		
194:2 - 195:6	Relevance, F.R.E. 401.		
196:3 - 197:5	Relevance, F.R.E. 401.		

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
197:20 - 198:9	Relevance, F.R.E. 401.		
198:15 - 200:2	Relevance, F.R.E. 401.		
200:3 - 200:9	Relevance, F.R.E. 401.		
201:22 - 204:7	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	201:22 - 204:20	NR, ARG
204:10 - 204:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	201:22 - 204:20	NR, ARG
206:3 - 206:20	Relevance, F.R.E. 401.		
209:14 - 209:18	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the	209:14 - 210:11	NR, ARG, CM

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	deposition, F.R.E. 106.		
210:4 - 210:4	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	209:14 - 210:11	NR, ARG, CM
210:5 - 210:5	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	209:14 - 210:11	NR, ARG, CM
210:7 - 210:11	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	209:14 - 210:11	NR, ARG, CM
210:13 - 210:14	Relevance, F.R.E. 401. The cited portion	210:13-210:17	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	reflects an incomplete exchange in the deposition, F.R.E. 106.		
210:16 - 210:17	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	210:13-210:17	NR, ARG
211:6 - 211:7	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
211:16 - 212:9	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
212:12 - 212:13	Relevance, F.R.E. 401. The cited portion	212:12 - 214:4	NR, ARG



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<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	reflects an incomplete exchange in the deposition, F.R.E. 106.		
212:16 - 214:4	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	212:12 - 214:4	NR, ARG
214:15 - 215:1	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
215:6 - 216:6	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	215:6 - 216:12	NR, ARG, CM
216:19 - 217:10	Relevance, F.R.E. 401.	216:19 - 217:13	NR, ARG

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<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
217:13 - 217:13	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	216:19 - 217:13	NR, ARG
217:18 - 218:11	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
222:15 - 222:22	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
223:18 - 223:20	Relevance, F.R.E. 401.	223:18 - 224:1	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
223:22 - 224:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	223:18 - 224:1	NR, ARG
224:3 - 224:7	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
227:2 - 229:16	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
230:8 - 231:5	Relevance, F.R.E. 401.	230:8 - 231:9	NR, ARG

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<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
231:9 - 231:12	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
232:12 - 232:16	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	232:12 - 232:19	NR, ARG
232:18 - 232:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	232:12 - 232:19	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
232:21 - 233:15	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
234:6 - 234:10	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
237:19 - 237:22	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
244:16 - 245:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	244:16 - 245:4	NR, ARG
245:4 - 245:4	Relevance, F.R.E. 401.	244:16 - 245:4	NR, ARG

<b>Misty Hampton – November 11, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
245:6 - 245:10	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
246:4 - 246:19	Relevance, F.R.E. 401.		

<b>Cathleen Latham – August 8, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
10:17 - 10:19	Relevance, F.R.E. 401.		
12:11 - 12:18	Relevance, F.R.E. 401.		
19:18 - 19:20	Relevance, F.R.E. 401.		
20:6 - 20:13	Fifth amendment		
21:20 - 21:23	Fifth amendment		

<b>Cathleen Latham – August 8, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter-Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
22:17 - 23:14	Fifth amendment		
23:15 - 26:5	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
26:19 - 27:6	Fifth amendment		
27:7 - 28:2	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
29:3 - 34:12	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
35:13 - 43:18	Lack of foundation/sp	43:25 - 44:7	ARG; NR;

<b>Cathleen Latham – August 8, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter-Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	eculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
44:12 - 48:19	Lack of foundation/sp eculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment	48:20 - 48:21	ARG; NR
48:22 - 48:22	Lack of foundation/sp eculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment	48:25 - 48:25	ARG; NR
48:24 - 48:24	Lack of foundation/sp eculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701;		



<b>Cathleen Latham – August 8, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter-Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Fifth amendment		
49:1 - 49:1	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
49:3 - 49:7	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment	48:8 - 49:8	ARG
49:9 - 49:9	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
49:11 - 49:12	Lack of foundation/speculation, F.R.E. 602;	49:13 - 49:13	ARG; NR

<b>Cathleen Latham – August 8, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter-Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	improper lay witness opinion, F.R.E. 701; Fifth amendment		
49:14 - 49:14	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
49:16 - 49:19			
50:6 - 51:8	Fifth amendment		
51:11 - 51:25		52:1 - 52:5	ARG; NR
52:10 - 52:13	Fifth amendment	53:5 - 53:8	ARG; NR
53:15 - 55:4	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
55:8 - 57:18	Lack of foundation/speculation, F.R.E. 602;		

<b>Cathleen Latham – August 8, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter-Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	improper lay witness opinion, F.R.E. 701; Fifth amendment		
60:9 - 60:22	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment	60:23 - 60:23	ARG; NR
60:24 - 60:24	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
61:1 - 61:15	Fifth amendment		
69:4 - 70:3	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701;		

<b>Cathleen Latham – August 8, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter-Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Fifth amendment		
70:16 - 73:16	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
73:17 - 75:20			
75:17 - 75:20			
105:10 - 106:25			
113:15 - 117:10			
117:24 - 121:4			
121:20 - 122:11	Relevance, F.R.E. 401		
122:12 - 123:13	Relevance, F.R.E. 401		
124:4 - 124:14			
126:15 - 127:15	Relevance, F.R.E. 401		
128:6 - 128:20		128:21 - 128:23	S
128:24 - 129:17	Relevance, F.R.E. 401		
131:21 - 134:11	Relevance, F.R.E. 401		
146:1 - 149:11	Relevance, F.R.E. 401		
152:12 - 154:7			
163:15 - 164:5	Relevance, F.R.E. 401		

<b>Cathleen Latham – August 8, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter-Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
164:12 - 165:2	Relevance, F.R.E. 401		
169:5 - 171:20		171:21 - 171:25	ARG
172:1 - 172:18			
173:20 - 176:1			
176:4 - 176:10			
176:11 - 179:6	Relevance, F.R.E. 401		
181:15 - 182:11		179:14 - 180:18	I; NR
187:17 - 191:2	Lack of foundation/speculation, F.R.E. 602		
203:2 - 203:20	Lack of foundation/speculation, F.R.E. 602		
203:25 - 206:9	Relevance, F.R.E. 401		
211:19 - 212:9		208:6 - 211:12	NR; SCOPE
212:19 - 212:22	Relevance, F.R.E. 401	212:23 - 212:24	ARG
212:25 - 212:25	Relevance, F.R.E. 401		

<b>Jeffrey Lenberg – November 21, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter-Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
10:15 - 10:17			
16:3 - 17:7	Relevance, F.R.E. 401		
22:4 - 23:6	Relevance, F.R.E. 401		

<b>Jeffrey Lenberg – November 21, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
23:11 - 24:14	Relevance, F.R.E. 401		
29:17 - 31:4	Relevance, F.R.E. 401		
32:13 - 32:17	Relevance, F.R.E. 401		
47:4 - 48:22		49:1 - 49:7, 51:13 - 52:8	I
53:11 - 57:9	Lack of foundation/sp eculation, F.R.E. 602; relevance, F.R.E. 401		
58:10 - 58:19	Relevance, F.R.E. 401	67:3 - 67:16	S; LO
71:8 - 72:7	Relevance, F.R.E. 401	69:21 - 71:7	I; NR
74:4 - 75:4	Relevance, F.R.E. 401		
75:5 - 75:16	Relevance, F.R.E. 401		
88:15 - 89:11	Relevance, F.R.E. 401		
90:15 - 96:9			
99:10 - 102:2	Relevance, F.R.E. 401		
102:11 - 104:5			
109:6 - 113:21	Relevance, F.R.E. 401		
114:7 - 115:22	Relevance, F.R.E. 401		
116:1 - 116:3			
116:7 - 116:9			
116:16 - 120:6	Relevance, F.R.E. 401		

<b>Jeffrey Lenberg – November 21, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
120:7 - 121:2	Relevance, F.R.E. 401		
121:3 - 121:21	Relevance, F.R.E. 401		
122:6 - 122:9			
123:1 - 129:22	Lack of foundation/sp eculation, F.R.E. 602; relevance, F.R.E. 401		
130:1 - 130:18	Lack of foundation/sp eculation, F.R.E. 602; relevance, F.R.E. 401		
132:12 - 134:4	Lack of foundation/sp eculation, F.R.E. 602; relevance, F.R.E. 401		
134:21 - 136:2			
136:6 - 136:7			
139:19 - 147:15	Relevance, F.R.E. 401		
152:5 - 153:2	Relevance, F.R.E. 401		
156:17 - 157:13	Relevance, F.R.E. 401		
159:4 - 159:8			
160:18 - 162:18			
164:8 - 165:14	Relevance, F.R.E. 401		

<b>Jeffrey Lenberg – November 21, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
173:21 - 174:8	Relevance, F.R.E. 401		
174:15 - 175:9	Relevance, F.R.E. 401		
175:18 - 176:22			
177:1 - 177:19			
178:13 - 178:22			
179:1 - 179:2		179:3 - 179:6	ARG; NR
179:8 - 180:4		180:5 - 180:6	ARG; NR
180:8 - 180:20	Relevance, F.R.E. 401		
183:11 - 184:16	Relevance, F.R.E. 401		
184:17 - 185:15	Relevance, F.R.E. 401		
187:8 - 189:22	Lack of foundation/sp eculation, F.R.E. 602; relevance, F.R.E. 401		
190:1 - 190:17	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702		



Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	and the basis for such testimony does not meet the requirements of F.R.E. 703. . Witness' testimony about his general understanding is irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
190:18 - 192:8	Lack of foundation/speculation/personal knowledge, F.R.E. 602 and hearsay, F.R.E. 801. Witness' testimony is irrelevant, F.R.E. 401.	194:3-10	F; I;

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
202:14 - 202:22	Lack of foundation/speculation/personal knowledge, F.R.E. 602; and improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Witness' testimony about his general understanding is irrelevant, F.R.E. 401, and is based on hearsay, F.R.E. 801.		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
203:1 - 204:22	Lack of foundation/speculation/personal knowledge, F.R.E. 602; and improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Witness' testimony is irrelevant, F.R.E. 401, and is based on hearsay, F.R.E. 801.		
206:2 - 206:3	Lack of foundation, F.R.E. 602, lack of authentication and identification by the		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	witness, F.R.E. 901.		
207:13 - 207:14	Lack of foundation, F.R.E. 901. Testimony is irrelevant, F.R.E. 401.		
209:4 - 210:4	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602. Witness' testimony is irrelevant, F.R.E. 401, and is hearsay, F.R.E. 801.		
219:8 - 220:5	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	for such testimony does not meet the requirements of F.R.E. 703. . Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Impermissibl y seeks a legal conclusion, F.R.E. 701 and and seeks opinion on ultimate issue, F.R.E. 704.		
220:6 - 220:19	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion,		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	<p>F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Witness' testimony is irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Impermissibl y seeks a legal conclusion, F.R.E. 701 and and seeks opinion on ultimate issue, F.R.E. 704.</p>		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
222:20 - 223:20	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Impermissibly seeks a legal		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	conclusion, F.R.E. 701 and and seeks opinion on ultimate issue, F.R.E. 704.		
224:15 - 224:20	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant,		



Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
225:15 - 226:19	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. .		
240:18 - 240:19	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602;	240:2-6, 240:11-15	I; NR

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	and witness' testimony is based on hearsay, F.R.E. 801 and is irrelevant, F.R.E. 401.		
240:21 - 241:11	Lack of foundation/speculation/personal knowledge, F.R.E. 602; and witness' testimony is based on hearsay, F.R.E. 801 and is irrelevant, F.R.E. 401.		
249:5 - 249:20		246:5-8, 247:15-20	I; NR
251:15 - 252:22	Lack of foundation/speculation/personal knowledge, F.R.E. 602; and witness' testimony is based on hearsay, F.R.E. 801 and is irrelevant, F.R.E. 401.		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
253:1 - 255:10	Lack of foundation/speculation/personal knowledge, F.R.E. 602; and witness' testimony is based on hearsay, F.R.E. 801 and is irrelevant, F.R.E. 401.		
255:11 - 256:4	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Question has been asked and answered and is argumentative F.R.E. 403 and is leading F.R.E. 611.		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
256:5 - 259:8	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Question has been asked and answered and is argumentative F.R.E. 403 and is leading F.R.E. 611.		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
259:16 - 259:22	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Question has been asked and answered and is argumentative, F.R.E. 403 and is leading F.R.E. 611.		
260:1 - 260:7	Lack of foundation/speculation/personal knowledge,		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	F.R.E. 602; improper lay witness opinion, F.R.E. 701. Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
260:12 - 262:4	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	requirements of F.R.E. 703. Witness' testimony is irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
267:17 - 268:8	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701, seeks a legal conclusion, F.R.E. 701; and seeks opinion on ultimate issue, F.R.E. 704.	268:9-20	S; NR; F
270:2 - 272:8	The cited portion reflects an incomplete answer, FRE 106		
274:2 - 274:5		271:7-12	I

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
289:2 - 289:22	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Witness' testimony is irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Hearsay, F.R.E. 801.		
290:1 - 291:15	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Hearsay, F.R.E. 801. Witness' testimony is irrelevant, F.R.E. 401.		



Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
293:12 - 293:20	Lack of foundation/speculation/personal knowledge, F.R.E. 602. Witness' testimony is irrelevant, F.R.E. 401.		
294:14 - 296:8	Witness' testimony is irrelevant, F.R.E. 401. Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Hearsay, F.R.E. 801.		
296:13 - 296:13	The cited portion does not accurately reflect a complete answer to the question, FRE 106		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
298:7 - 300:5	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Hearsay, F.R.E. 801. Witness' testimony is irrelevant, F.R.E. 401.		
301:14 - 302:1	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	of F.R.E. 703. . Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Impermissibly seeks a legal conclusion, F.R.E. 701.		
302:5 - 302:17	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	the requirements of F.R.E. 703. . Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Impermissibly seeks a legal conclusion, F.R.E. 701 and and seeks opinion on ultimate issue, F.R.E. 704.		
304:2 - 304:10	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been		

Jeffrey Lenberg – November 21, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	<p>qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Impermissibl y seeks a legal conclusion, F.R.E. 701 and and seeks opinion on ultimate issue, F.R.E. 704.</p>		
305:5 - 305:10		308:1-8, 309:18-22, 310:4-18, 329:2-5	SCOPE; I; S; F; LO

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
8:3 - 8:4			
10:2 - 10:7			
10:19 - 11:5	Lack of foundation/speculation/personal knowledge, F.R.E. 602. Witness' testimony is based on hearsay, F.R.E. 801 (as he testified at 11:16-19) and is irrelevant, F.R.E. 401.	11:14-16 (ending at "math")	I; SCOPE; NR
12:2 - 12:11	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	testimony does not meet the requirements of F.R.E. 703. Witness' testimony is vague, based on hearsay, F.R.E. 801, and is irrelevant, F.R.E. 401.		
13:3 - 13:9	Witness' testimony is vague, based on hearsay, F.R.E. 801, and is irrelevant, F.R.E. 401.		
13:15 - 14:21	Witness' testimony is vague, based on hearsay, F.R.E. 801, and is irrelevant, F.R.E. 401. ness lacked personal knowledge of who made the hearsay statements, F.R.E. 602.		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
15:10 - 17:18	Witness' testimony is vague, based on hearsay, F.R.E. 801, and is irrelevant, F.R.E. 401. Lack of foundation/speculation/personal knowledge, F.R.E. 602.		
22:25 - 24:12	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Hearsay,		



Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	F.R.E. 801.Witness' testimony is irrelevant, F.R.E. 401.		
25:23 - 26:10	Lack of foundation/sp eculation/per sonal knowledge/pe rsonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. . Hearsay, F.R.E. 801.Witness' testimony is irrelevant, F.R.E. 401.		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
27:7 - 27:16	Lack of foundation/speculation/personal knowledge/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Hearsay, F.R.E. 801. Witness' testimony is irrelevant, F.R.E. 401 and constitutes a legal conclusion, F.R.E. 701.		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
30:2 - 33:11	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Impermissibly seeks a legal		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	conclusion, F.R.E. 701 and seeks opinion on ultimate issue, F.R.E. 704.		
33:17 - 33:22	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant,		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403. Impermissibl y seeks a legal conclusion, F.R.E. 701 and seeks opinion on ultimate issue, F.R.E. 704.		
35:21 - 36:5	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	of F.R.E. 703. Witness' testimony is irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
44:19 - 45:10	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
45:11 - 45:24	Lack of foundation/speculation/personal knowledge, F.R.E. 602 (witness testified that he did not know who the attorney was working for 45:25-46:3); improper lay witness opinion, F.R.E. 701. Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
46:8 - 46:10			
46:14 - 46:23			
47:11 - 48:2	Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant,		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
50:8 - 50:18	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 401 and 403.		
51:11 - 54:17	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 401 and 403 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony meet the requirements of F.R.E. 703.		



Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	Lack of foundation, F.R.E. 901, lack of personal knowledge, F.R.E. 602 and improper legal conclusion, F.R.E. 701.		
55:3 - 56:5	Improper testimony/comment by questioning attorney should be omitted. Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 401 and 403 and is improper lay witness opinion, F.R.E. 701. Lack of foundation, F.R.E. 901 and lack of personal knowledge, F.R.E. 602.		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	and witness has not been qualified as an expert, F.R.E. 702.		
56:13 - 60:19	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 401 and 403 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Lack of foundation, F.R.E. 901, and lack of personal knowledge,	60:20-61:6.	S; LO

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	<p>F.R.E. 602 (see 60:20- 61:6). Testimony is irrelevant, F.R.E. 401 and would otherwise be subject to exclusion under F.R.E. 403. The testimony is an improper legal conclusion, F.R.E. 701 and states an opinion on the ultimate issue, F.R.E. 704.</p>		
61:7 - 62:13	<p>Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Witness' testimony about his general understandin</p>		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	g is irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703.		
65:23 - 66:11	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	testimony does not meet the requirements of F.R.E. 703. Witness' testimony about his general understanding is irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
78:8 - 78:8	The cited portion reflects an incomplete answer, FRE 106 and is not relevant, F.R.E. 401.		
84:18 - 86:8	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R. E. 801 and is not relevant, F.R.E. 401 and 403 and		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703.		
87:15 - 88:5	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet	95:1-6.	I; NR

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	the requirements of F.R.E. 703.		
91:3 - 92:3	Witness' testimony is based on speculation, F.R.E. 701, is hearsay, F.R.E. 801. Testimony is not relevant, F.R.E. 401 and 403.		
101:14 - 103:8	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403.		
107:8 - 107:11	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801.		
107:12 - 108:20	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602.		
108:21 - 109:11	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of		



<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	facts, F.R.E. 602.		
110:4 - 111:13	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
112:1 - 112:8	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
112:21 - 113:18	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
115:12 - 116:2	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
117:8 - 117:25	Witness' testimony is based on speculation, F.R.E. 701		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
119:2 - 119:7	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
119:8 - 120:15	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of		

## EXHIBIT 5

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
121:11 - 121:15			
122:21 - 123:20	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
124:11 - 124:15	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403.		
124:24 - 126:5	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403.		
126:6 - 127:9	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and/or is subject to exclusion		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	under F.R.E. 403.		
128:18 - 130:12	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403.		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
132:1 - 133:11	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403.		
135:23 - 136:8	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay		



Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403.		
137:4 - 137:20	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	for such testimony does not meet the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403.		
137:21 - 138:24	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
139:24 - 140:16	Witness is giving an inadmissible opinion as he has not been qualified as an expert, F.R.E. 702.		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
148:7 - 149:2	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
149:19 - 151:1	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
155:25 - 157:4	Witness' testimony is based on speculation, F.R.E. 701		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
167:24 - 169:21	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403. The cited portion also includes improper and inadmissible statements or testimony by the questioning attorney.		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
188:8 - 190:16	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and subject to exclusion F.R.E. 403.		
195:4 - 195:8	Lack of foundation as exhibit was not properly authenticated or identified, F.R.E. 901.		
196:2 - 196:7	Lack of foundation, F.R.E. 901, hearsay, F.R.E. 801, Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant,		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	F.R.E. 401 and subject to exclusion F.R.E. 403. Witness is giving an inadmissible opinion as he has not been qualified as an expert, F.R.E. 702.		
196:11 - 197:14	Lack of foundation, F.R.E. 901, hearsay, F.R.E. 801, Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and subject to exclusion F.R.E. 403. Witness is giving an inadmissible opinion as he has not been qualified as an expert, F.R.E. 702.		

Doug Logan – November 18, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
202:17 - 202:19	Lack of foundation, F.R.E. 901, hearsay, F.R.E. 801, Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and subject to exclusion F.R.E. 403. Witness is giving an inadmissible opinion as he has not been qualified as an expert, F.R.E. 702.		
202:25 - 203:14	Lack of foundation, F.R.E. 901, hearsay, F.R.E. 801, Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401		

<b>Doug Logan – November 18, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	and subject to exclusion F.R.E. 403. Witness is giving an inadmissible opinion as he has not been qualified as an expert, F.R.E. 702.		
207:9 - 207:17	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.	209:21-210:11, 210:20-22, 212:22- 213:3, 213:20-24, 221:19-222:3, 223:8-17	SCOPE; NR; I; S

<b>Jil Ridlehoover – August 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
8:20 - 8:22			
11:19 - 11:22			



<b>Jil Riddlehoover – August 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
15:6 - 15:18			
16:8 - 16:11	Incomplete. F.R.E. 106.	16:22-17:7	
17:2 - 17:3	Incomplete. F.R.E. 106.	16:22-17:7	
22:9 - 29:3	Testimony is individually and collectively either irrelevant. (F.R.E. 401) or subject to exclusion due to confusion of issues, cumulative, and minimal (if any) probative value (F.R.E. 403) because the witness cannot provide probative testimony regarding election-day activities that are outside the scope of the witness’s personal knowledge specifying her		

Jil Ridlehoover – August 16, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	scope of prior employment (F.R.E. 602) in response to questions that are impermissibly vague, misleading, and confusing questions (F.R.E. 403) that misstate the evidence/testimony, lack foundation (F.R.E. 901), call for speculation (F.R.E. 701), and seeks improper opinion/unfounded conclusions (F.R.E. 701-02).		

Jil Ridlehoover – August 16, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
31:3 - 34:20	Testimony is individually and collectively either irrelevant (F.R.E. 401), or subject to exclusion due to confusion of issues, cumulative, and minimal (if any) probative value (F.R.E. 403) because the witness cannot provide probative testimony regarding election-day activities that are outside the scope of the witness’s personal knowledge specifying her scope of prior employment (F.R.E. 602) in response to questions that		

Jil Ridlehoover – August 16, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	are impermissibly vague, misleading, and confusing questions (F.R.E. 403) that misstate the evidence/testimony, lack foundation (FRE 901), call for speculation (F.R.E. 701), and seeks improper opinion/unfounded conclusions. F.R.E. 701-02.		
46:16 - 50:22	Testimony is individually and collectively either irrelevant (F.R.E. 401), or subject to exclusion due to confusion of issues, cumulative, and minimal (if any)		

Jil Ridlehoover – August 16, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	probative value (F.R.E. 403) because the witness cannot provide probative testimony regarding election-day activities that are outside the scope of the witness’s personal knowledge specifying her scope of prior employment (F.R.E. 602) in response to questions that are impermissibly vague, misleading, and confusing questions (F.R.E. 403) that misstate the evidence/testimony, lack foundation (FRE 901), call for		

<b>Jil Ridlehoover – August 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	speculation (F.R.E. 701), and seeks improper opinion/unfounded conclusions. F.R.E. 701-02.		
51:12 - 53:18	Relevance, F.R.E. 401.		
54:7 - 54:17	Question seeks testimony regarding the content of out-of-court verbal statements that constitute hearsay pursuant to FRE 801		
55:1 - 55:2	Hearsay. F.R.E. 803.		
55:6 - 55:15	Hearsay. F.R.E. 803.		
63:4 - 64:10			
65:7 - 65:11			
65:15 - 66:2			
66:11 - 66:21			
67:13 - 67:19			

<b>Jil Ridlehoover – August 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
68:7 - 68:22			
69:1 - 69:9			
73:8 - 74:4			
74:6 - 74:10	<p>Answer to question (71:1-4) is compound (F.R.E. 403/611(a)), vague, misleading, and confusing question (F.R.E. 403) that lacks foundation (FRE 901), calls for speculation (F.R.E. 701), and seeks improper opinion/unfounded conclusions (F.R.E. 701-02), and otherwise seeks testimony this outside the scope of the witness’s personal knowledge. F.R.E. 602.</p>		

Jil Ridlehoover – August 16, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
74:19 - 75:18	<u>75:2-15:</u> improper lay witness describing portions of video that speaks for itself under Best Evidence Rule (FRE 1001)		
82:15 - 83:17			
84:22 - 85:4	Question is compound (F.R.E. 403/611(a)), vague, misleading, and confusing questions (F.R.E. 403) that misstate the evidence/testi mony, lack foundation (F.R.E. 901), calls for speculation (F.R.E. 701), seeks improper opinion/unfou nded conclusions (F.R.E. 701-		



<b>Jil Ridlehoover – August 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	02), and otherwise seeks testimony this outside the scope of the witness’s personal knowledge (F.R.E. 602).		
88:15 - 89:16	Questions are compound (F.R.E. 403/611(a)), vague, misleading, and confusing (F.R.E. 403) lack foundation (F.R.E. 901), calls for speculation (F.R.E. 701), and seeks improper opinion/unfounded conclusions (F.R.E. 701-02).		
89:21 - 90:1			
90:2 - 90:20			
95:20 - 96:20			
97:2 - 97:6			
97:21 - 99:7			

<b>Jil Ridlehoover – August 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
99:17 - 100:1			
101:9 - 101:11			
101:15 - 101:17			
134:22 - 135:13			
136:7 - 136:17	<p><u>136:14-17,</u> <u>136:20:</u> Answer to question that is compound (F.R.E. 403/611(a)), vague, misleading, and confusing questions (F.R.E. 403) that misstate the evidence/testimony, lack foundation (F.R.E. 901), calls for speculation (F.R.E. 701), seeks improper opinion/unfounded conclusions (F.R.E. 701-02), and otherwise seeks testimony this outside the</p>		

<b>Jil Ridlehoover – August 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	scope of the witness’s personal knowledge (F.R.E. 602).		
136:20 - 137:8			
138:22 - 139:20			
140:2 - 140:13			
140:16 - 143:6			
147:14 - 152:10			
160:6 - 160:9			
161:3 - 161:5			
165:12 - 166:11			
168:4 - 169:20			
171:5 - 171:10			
171:19 - 172:13			
175:14 - 175:21			
176:2 - 176:4			
176:10 - 176:10			
177:8 - 178:2	Cumulative/Asked and Answered. F.R.E. 403.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
10:1 - 10:3			

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
11:25 - 12:3			
15:9 - 15:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
17:14 - 18:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
19:21 - 19:23	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	19:21-20:18	ARG; NR
20:4 - 20:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
20:22 - 21:8	Relevance, F.R.E. 401.		
23:10 - 24:8	Relevance, F.R.E. 401.		
24:9 - 25:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited	24:9-25:5	ARG; NR

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	portion reflects an incomplete statement.		
25:4 - 25:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
26:12 - 26:19	Relevance, F.R.E. 401.		
27:5 - 27:8	Relevance, F.R.E. 401.		
27:22 - 27:25	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
28:2 - 28:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	27:22-28:18	ARG; NR
28:15 - 28:18	Lack of foundation/spe culation,		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
28:22 - 29:1	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	28:22-29:11	F; ARG
29:3 - 29:11	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
31:3 - 31:14	Relevance, F.R.E. 401.		
31:19 - 31:21	Relevance, F.R.E. 401.		
32:6 - 33:4	Relevance, F.R.E. 401.		
33:15 - 34:4	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
36:5 - 37:5	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
37:13 - 39:2	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
39:17 - 40:1	Relevance. F.R.E. 401.		
40:21 - 41:19	Relevance. F.R.E. 401.		
42:10 - 42:18	Relevance. F.R.E. 401.		
42:19 - 43:21	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
43:22 - 44:19	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
44:20 - 46:11	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
48:20 - 49:1	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	48:24-49:1	
49:3 - 49:14	Lack of foundation/spe culation, F.R.E. 602;		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
50:7 - 50:16	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
50:21 - 50:25	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
58:6 - 58:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
59:4 - 59:20	Lack of foundation/spe culation, F.R.E. 602;		



<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Relevance, F.R.E. 401.		
67:2 - 67:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	67:7-67:12	CM; I
67:17 - 68:11	Relevance, F.R.E. 401.		
69:5 - 69:10	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
71:9 - 71:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
71:19 - 71:19	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
72:5 - 73:10	Lack of foundation/spe culation, F.R.E. 602;		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
74:9 - 75:7	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	74:9-74:22	
75:13 - 75:15	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
75:19 - 76:9	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
77:1 - 77:4	Lack of foundation/spe culation, F.R.E. 602;		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
77:7 - 77:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
81:3 - 81:7	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
81:9 - 81:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
81:18 - 82:3	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
82:5 - 82:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
82:15 - 83:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
83:7 - 83:9	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401;		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	and the cited portion reflects an incomplete statement.		
86:5 - 86:19	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
87:9 - 87:25	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
89:2 - 89:16	Relevance, F.R.E. 401.		
89:23 - 91:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
91:11 - 91:22	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
92:19 - 96:3	Lack of foundation/spe		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	culuation, F.R.E. 602; Relevance, F.R.E. 401.		
97:10 - 97:15	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
97:23 - 98:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
99:20 - 100:4	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
100:10 - 100:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
101:8 - 102:1	Lack of foundation/spe culation, F.R.E. 602;		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Relevance, F.R.E. 401.		
102:13 - 102:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
102:22 - 103:2	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
103:4 - 104:3	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
104:5 - 104:23	Lack of foundation/spe culation, F.R.E. 602;		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
105:7 - 105:12	Relevance, F.R.E. 401.		
106:14 - 108:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
110:24 - 111:2	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
111:25 - 112:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
114:25 - 116:8	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		



<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
126:10 - 126:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
129:11 - 129:11	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
129:14 - 129:21	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
129:23 - 130:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
130:24 - 131:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
133:7 - 134:2	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
135:11 - 136:8	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	136:4-136:8	
136:10 - 136:14	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
145:11 - 145:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	145:11-145:16	
153:20 - 154:4	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
154:6 - 154:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
155:4 - 155:22	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	155:4-155:8	
155:23 - 156:22	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
156:24 - 157:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
166:15 - 168:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
169:6 - 169:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
169:14 - 169:24	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	169:21-169:24	

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
185:13 - 187:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
189:13 - 189:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
189:21 - 190:6	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
197:24 - 198:10	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
198:12 - 199:14	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
200:3 - 200:18	Relevance, F.R.E. 401.		
200:19 - 204:9	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
204:12 - 204:21	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
205:17 - 206:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
206:3 - 206:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
206:22 - 207:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
207:14 - 209:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
212:6 - 212:19	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
218:18 - 218:25	Relevance, F.R.E. 401.		
10:1 - 10:3			
11:25 - 12:3			
15:9 - 15:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
17:14 - 18:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
19:21 - 19:23	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	19:21-20:18	ARG; NR
20:4 - 20:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
20:22 - 21:8	Relevance, F.R.E. 401.		
23:10 - 24:8	Relevance, F.R.E. 401.		
24:9 - 25:1	Lack of foundation/spe culation, F.R.E. 602;	24:9-25:5	ARG; NR



Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
25:4 - 25:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
26:12 - 26:19	Relevance, F.R.E. 401.		
27:5 - 27:8	Relevance, F.R.E. 401.		
27:22 - 27:25	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
28:2 - 28:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	27:22-28:18	ARG; NR

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
28:15 - 28:18	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
28:22 - 29:1	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	28:22-29:11	
29:3 - 29:11	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
31:3 - 31:14	Relevance, F.R.E. 401.		
31:19 - 31:21	Relevance, F.R.E. 401.		
32:6 - 33:4	Relevance, F.R.E. 401.		
33:15 - 34:4	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
36:5 - 37:5	Relevance. F.R.E. 401; Calls for		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	speculation. F.R.E. 602.		
37:13 - 39:2	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
39:17 - 40:1	Relevance. F.R.E. 401.		
40:21 - 41:19	Relevance. F.R.E. 401.		
42:10 - 42:18	Relevance. F.R.E. 401.		
42:19 - 43:21	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
43:22 - 44:19	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
44:20 - 46:11	Relevance. F.R.E. 401; Calls for speculation. F.R.E. 602.		
48:20 - 49:1	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
49:3 - 49:14	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
50:7 - 50:16	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
50:21 - 50:25	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
58:6 - 58:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
59:4 - 59:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
67:2 - 67:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
67:17 - 68:11	Relevance, F.R.E. 401.		
69:5 - 69:10	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
71:9 - 71:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
71:19 - 71:19	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
72:5 - 73:10	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
74:9 - 75:7	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
75:13 - 75:15	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
75:19 - 76:9	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
77:1 - 77:4	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
77:7 - 77:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
81:3 - 81:7	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
81:9 - 81:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401;		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	and the cited portion reflects an incomplete statement.		
81:18 - 82:3	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
82:5 - 82:13	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
82:15 - 83:5	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		



<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
83:7 - 83:9	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
86:5 - 86:19	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	86:5-87:8	
87:9 - 87:25	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
89:2 - 89:16	Relevance, F.R.E. 401.		
89:23 - 91:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
91:11 - 91:22	Lack of foundation/spe		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	culuation, F.R.E. 602; Relevance, F.R.E. 401.		
92:19 - 96:3	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
97:10 - 97:15	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
97:23 - 98:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
99:20 - 100:4	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
100:10 - 100:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	an incomplete statement.		
101:8 - 102:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
102:13 - 102:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
102:22 - 103:2	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
103:4 - 104:3	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	portion reflects an incomplete statement.		
104:5 - 104:23	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
105:7 - 105:12	Relevance, F.R.E. 401.		
106:14 - 108:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	108:19-109:21	ARG; NR; S
110:24 - 111:2	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
111:25 - 112:12	Lack of foundation/spe culation, F.R.E. 602;		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Relevance, F.R.E. 401.		
114:25 - 116:8	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
126:10 - 126:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
129:11 - 129:11	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
129:14 - 129:21	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
129:23 - 130:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
130:24 - 131:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
133:7 - 134:2	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
135:11 - 136:8	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
136:10 - 136:14	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
145:11 - 145:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
153:20 - 154:4	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
154:6 - 154:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
155:4 - 155:22	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
155:23 - 156:22	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
156:24 - 157:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
166:15 - 168:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
169:6 - 169:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		



## EXHIBIT 5

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
169:14 - 169:24	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
185:13 - 187:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
189:13 - 189:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	187:24-189:24	S; ARG
189:21 - 190:6	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
197:24 - 198:10	Lack of foundation/spe- culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	194:6-195:10	CM
198:12 - 199:14	Lack of foundation/spe- culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
200:3 - 200:18	Relevance, F.R.E. 401.		
200:19 - 204:9	Lack of foundation/spe- culation, F.R.E. 602; Relevance, F.R.E. 401.		
204:12 - 204:21	Lack of foundation/spe- culation, F.R.E. 602; Relevance, F.R.E. 401.	204:6-205:16	

## EXHIBIT 5

Wendell Stone – September 1, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
205:17 - 206:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
206:3 - 206:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
206:22 - 207:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
207:14 - 209:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401;		

<b>Wendell Stone – September 1, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	and the cited portion reflects an incomplete statement.		
212:6 - 212:19	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
218:18 - 218:25	Relevance, F.R.E. 401.		

<b>Ed Voyles – November 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
16:11 - 16:13			
38:18 - 38:20	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
39:1 - 39:10	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		

<b>Ed Voyles – November 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
44:13 - 44:19	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
61:2 - 62:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
62:19 - 63:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
68:2 - 69:15	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
70:1 - 70:7	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects		

<b>Ed Voyles – November 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	an incomplete statement.		
70:11 - 70:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
70:14 - 74:2	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
74:9 - 74:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
74:17 - 75:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
78:9 - 78:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
78:21 - 79:12	Lack of foundation/spe culation,	77:12-83:8	ARG: NR; SCOPE

Ed Voyles – November 16, 2022 Deposition Designations	Defendants’ Objection(s)	Defendants’ Counter- Designation(s)	Plaintiffs’ Counter Objections
	F.R.E. 602; Relevance, F.R.E. 401.		
82:11 - 82:15	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
82:18 - 83:2	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
83:6 - 83:8	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	83:9-83:13	S
83:14 - 83:16	Lack of foundation/spe culation,		

<b>Ed Voyles – November 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	F.R.E. 602; Relevance, F.R.E. 401.		
90:3 - 90:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
90:18 - 90:21	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	90:18-91:15	ARG; NR
91:4 - 91:15	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
93:16 - 95:19	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
97:5 - 97:18	Lack of foundation/spe culation, F.R.E. 602;		



<b>Ed Voyles – November 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
	Relevance, F.R.E. 401.		
98:18 - 99:16	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
109:2 - 109:4			
109:6 - 109:11	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
113:4 - 114:8	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
115:5 - 116:9	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
120:7 - 120:17	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
121:9 - 121:10			
126:5 - 126:10			

<b>Ed Voyles – November 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
126:11 - 128:3	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
140:12 - 142:16	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	140:12-142:19	ARG; NR
142:19 - 143:7	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
144:1 - 144:17	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
144:21 - 146:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	144:21-148:4	ARG; NR; S
146:8 - 147:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		

<b>Ed Voyles – November 16, 2022 Deposition Designations</b>	<b>Defendants’ Objection(s)</b>	<b>Defendants’ Counter- Designation(s)</b>	<b>Plaintiffs’ Counter Objections</b>
149:7 - 150:13	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
155:21 - 156:14	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
165:1 - 166:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
176:7 - 178:4	F.R.E. 602; Relevance, F.R.E. 401.		
178:8 - 178:17	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**ATTACHMENT E-2**

DEFENDANTS' DEPOSITION DESIGNATIONS  
PLAINTIFFS' COUNTER-DESIGNATIONS  
DEFENDANTS' OBJECTIONS TO COUNTER-DESIGNATIONS

Code	Objection
ARG	Lawyer Argument or Colloquy. Plaintiffs object to this deposition designation because it is lawyer argument and not testimony of the witness.
CM	Cumulative. Plaintiffs object to this deposition designation on the ground that it is duplicative and/or cumulative of other designations.
F	Foundation. Plaintiffs object to this deposition designation on the ground that the foundation necessary for its admission has not been laid. (Fed. R. Evid. 602)
H	Hearsay. Plaintiffs object to this deposition designation because it constitutes or contains hearsay. (Fed. R. Evid. 801-802)
I	Incomplete. Plaintiffs object to this deposition designation because it does not contain the complete testimony. (Fed. R. Evid. 106) Plaintiffs generally objects to all designations that include only part of a question and/or part of an answer, or that do not include any question.
NR	Not Relevant. Plaintiffs object to this deposition designation because it is not relevant to any issue to be decided in this case. (Fed. R. Evid. 401-402)
LO	Lay Opinion. Plaintiffs object to this deposition designation because it constitutes or contains improper opinion by a lay witness. (Fed. R. Evid. 701-702)
NRT	Non-Responsive Testimony. Plaintiffs object to this deposition designation because it includes statements that are not responsive to the question asked.
S	Speculative. Plaintiffs object to this deposition designation because it includes statements that are speculative as to matters of fact or law.
SCOPE	Beyond Scope of 30(b)(6) Notice or Topics. Plaintiffs object to this deposition designation because it is outside the scope of the topics on which the witness was designated as a corporate representative.
403	FRE 403. Plaintiffs object to this deposition designation because any probative value it has is substantially outweighed by a danger of one or more of the following: unfair prejudice,

	confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. (Fed. R. Evid. 403)
VA	Vague and Ambiguous. Plaintiffs object to this deposition designation because it includes vague and indefinite statements.
P	Privilege Objection. Plaintiffs object to this designation because it includes privilege objections or attempts to solicit privileged information.
L	Leading. Plaintiffs object as an improper leading question.
COM	Compound. The question is compound and thus not clear which question the deponent is answering.
BE	Best Evidence. Plaintiffs object to this question because it asks a witness to testify about the contents of an original writing, recording, or photograph where the original is available. (FRE 1002)
LEGAL	Plaintiffs object to this question because it calls for a legal conclusion.

<b>Andrew Appel - January 27, 2022 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
38:22–39:03			
40:23–41:04		VA	
41:05–08			
67:20–25	68:1-11	I	
85:17–21	84:23-85:16, 85:22-87:11	I, VA	
100:03–11	97:5-8, 99:5- 102:11	I	Beyond the scope of examination, not responsive to designation FRE 611; lacks reliable methodology and unhelpful FRE 702 & 703; if

			admitted, then 95:9-97:4, 97:9-99:2, 102:12-106:5 should also be admitted FRE 106
101:07– 11	97:5-8, 99:5-102:11	I	Beyond the scope of examination, not responsive to designation FRE 611; lacks reliable methodology and unhelpful FRE 702 & 703; if admitted, then 95:9-97:4, 97:9-99:2, 102:12-106:5 should also be admitted FRE 106

<b>Dr. Alex Halderman - November 17, 2021 Deposition Designations</b>	<b>Plaintiffs’ Counter Designation</b>	<b>Plaintiffs’ Objections</b>	<b>Defendants’ Counter Designation Objections</b>
30:17– 33:10	30:12-16; 35:21-37:9	I, VA	Beyond the scope of examination, not responsive to designation FRE 611; lacks reliable methodology and unhelpful FRE 702 & 703; if admitted, then 33:11-34:4 & 35:6-35:20 should also be admitted FRE 106
33:11–34:4			
35:6– 35:20			

<b>Dr. Alex Halderman - January 3, 2023 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
23:23-24:9		I, VA, NR, NRT	
38:13-21		I, VA, NR, NRT	
40:3-7		I, VA, NR, NRT	
42:5-20		I, VA, NR, NRT	
64:9-19		I, VA, NR, NRT	

<b>Teresa Lynn Ledford - June 24, 2019 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
37:8-38:4	36:18-37:7; 38:22-39:1	F, H, I, NR, VA	
49:8-22	49:23-50:8	F, H, I, NR	

<b>Donna Curling - January 19, 2022 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
11:19-23	11:7-9; 11:18	F, H, I, NR, 403, VA	If admitted, then 11:10-17 should also be admitted FRE 106
11:22-23	11:7-9; 11:20	F, H, I, NR, 403, VA	If admitted, then 11:10-18 should also be admitted FRE 106
12:4-10	11:24-12:3	F, H, I, NR, 403	



13:2-8	12:21-22; 13:9-17	F, H, I, NR	
16:24-17:5	35:20-36:22; 37:1-13; 87: 3-9; 132:17-25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	Portions are not responsive to the designation FRE 611; includes hearsay 802; improper opinion testimony FRE 702 & 703; If admitted, then 37:14-15, 135:6-136:13, should also be admitted FRE 106
18:21-19:11	35:20-36:22; 37:1-13; 87: 3-9; 129:9-130:20; 132:17-25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	Portions are not responsive to the designation FRE 611; includes hearsay FRE 802 improper opinion testimony FRE 702 & 703; If admitted, then 37:14-15, 135:6-136:13, 130:21-132:6 should also be admitted FRE 106
21:7-12	35:20-36:22; 37:1-13; 87: 3-9; 129:9-130:20; 132:17-25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	Portions are not responsive to the designation FRE 611; includes hearsay FRE 802; improper opinion testimony FRE 702 & 703; If admitted, then 37:14-15, 135:6-136:13, 130:21-132:6 should also

			be admitted FRE 106
21:15-20	35:20-36:22; 37:1-13 87: 3-9; 129:9-130:20; 132:17-25; 133:1-16	ARG, CM, I, S, VA, LEGAL	"(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (132:17-25) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice,

## EXHIBIT 5

			confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602."
22:1	35:20-36:22; 37:1-13; 87: 3-9; 129:9-130:20; 132:17-25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	"(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (132:17-25) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602.

			(133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602."
22:9-18	35:20-36:22; 37:1-13; 87: 3- 9; 129:9- 130:20; 132:17- 25; 133:1-16	ARG, CM, I, LO,S, VA, COM, LEGAL	(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (132:17-25) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack

			of foundation/speculation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602.
22:23-24	35:20-36:22; 37:1-13; 87: 3-9; 129:9-130:20; 132:17-25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (87: 3-9) (129:9-130:20) (132:17-25) - Relevance, F.R.E.

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			401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602.
23:5-9	35:20-36:22; 37:1-13; 87: 3-9; 129:9-130:20; 132:17-25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602;

## EXHIBIT 5

			<p>hearsay, F.R.E. 802.  (132:17-25) -  Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602.  (133:1-16) -  Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602.</p>
23:21-24:2	35:20-36:22; 37:1-13; 87: 3-9; 129:9-130:20; 132:17-25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack

			<p>of foundation/speculation, F.R.E. 602; hearsay, F.R.E. 802. (132:17-25) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602.</p>
24:16-25:5	42:24-43:4; 83:5-19; 133:1-16	CM, F, H, I, LO, S, VA, COM, LEGAL	<p>(83:5-19) - Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack</p>



## EXHIBIT 5

			of foundation/speculation, F.R.E. 602.
26:4-9	42:24-43:4; 83:5-19	CM, F, H, I, LO, S, VA, LEGAL	(83:5-19) - Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602.
26:10-14	42:24-43:4; 83:5-19	CM, F, H, I, LO, S, VA, LEGAL	(83:5-19) - Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/speculation, F.R.E. 602.
29:10-25	30:5-16	F, H, I, NR, 403	Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403;
30:1-4	30:5-16	F, H, I, NR, 403	Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403;
31:25-32:7	30:5-16	F, H, I, NR, 403	Irrelevant, FRE 401
33:12-15			
34:15		I, NR, VA	
35:11-12		NR, 403	
35:8-10		NR, 403	
35:15-19	35:13-14	I, NR	
40:23-41:2		I, NR, 403	

41:7-12			
42:13-43:1	42: 3-7, 10	I, VA	
43:2-14	83:5-19	CM, I, S	Counter-designation is not related to designation; speculative, FRE 602
43:16-24	43:5-7; 43:10-14; 85:5-19	H, I	Counter-designation is not related to designation; speculative, FRE 602
45:22-46:17	44:22-45:1; 45:5-21; 46:18-47:4; 48:23-49:1; 77:2-6	F, H, I, S, VA	
47:6- 48:22	46:17-47:1; 48:23-49:1; 77:2-6	F, H, I, S, VA	
51:21-23	37:1-9	CM, F, H, I, S, LO, S, LEGAL	Speculative/lack of personal knowledge, FRE 602
51:24-52:5	37:1-9	CM, F, H, I, S, LO, S, LEGAL	Speculative/lack of personal knowledge, FRE 602; unrelated to designation
52:14-16	52:17-18, 52:24-53:5	F, H, I	
56:10-15	35:20-36:22; 37:1-9; 87: 3-9	CM, F, H, I, S, LO, S, LEGAL	Speculative/lack of personal knowledge, FRE 602; unrelated to designation
59:4-5	58:18-24; 59:3	F, I, S, LO, LEGAL	FRE 403 & 611(a): Incomplete

59:7-11		F, S, LO, LEGAL	
63:8-17	62:22-63:3	F, H, I, NR, LO, S, VA	
65:3-7	134:7-19; 52:17-18; 52: 24-53:5; 64:13- 65:2	F, H, I, S, LO, VA	
68:15-69:6	37:1-9	CM, F, H, I, LO, S, VA	FRE 602: Speculation
69:10- 70:3	47:10-48:3; 69:7-9; 70:4-5; 70:8-9	F, H, I, S, LO, S, LEGAL	
71:5-7	70:11-14; 70:18-20; 70:22-71:4	F, H, I, S, LO, LEGAL	FRE 403 & 611(a): Incomplete
71:8-18	70:11-14; 70:18-20; 70:22-71:4	F, S, LO, LEGAL, ARG, I	FRE 403 & 611(a): Incomplete
72:2-3		CM, F, LO, LEGAL	
72:7-9	72:11-72:16	CM, F, I, LO, LEGAL, I	
73:15-23	71:20-22; 73:24-74:2	CM, F, I, S, LO, LEGAL	FRE 403 & 611(a): Incomplete
74:3-9	74:10-11; 74:14-19	I	
77:2-6	70:4-5; 70:8-9; 76:3-77:1	CM, F, LO, S, I	
79:1-4	79:5-79:8;	F, I, LO,S, VA, LEGAL	
79:9-15	79:17-79:18, 79:20	F, I, VA, S, LO, LEGAL, ARG	
80:8-11	53:9-15; 53:21- 24; 54:4-8; 81:2-81:5; 81:9-	VA, S, LO, LEGAL, CM, I	Not relevant to the original designation

	10; 82:9-12; 83:5-19		
85:18-23	67:23-68:2; 83:5-22; 84:4-8; 85:12-17	VA, I, LO, 403, CM	No objection to 85:12-17; Defendants object to the remaining counter- designations as not relevant to the original designation
85:5-11	67:23-68:2; 83:5-22; 84:4-8;	VA, I, 403, LO, CM	Not relevant to the original designation
85:24-86:3	67:23-68:2; 83:5-22; 84:4-8	403, CM, I	Not relevant to the original designation
87:3-9	35:20-37:13	I, 403, CM, S, VA, LO, LEGAL	Not relevant to the original designation; not relevant (DREs) under FRE 401; lack of foundation/specul ation, FRE 602
89:21-24	67:23-68:2; 88:24-89-20	I, 403, CM, VA, LO	Not relevant to the original designation; not relevant (DREs) under FRE 401
90:11-16	67:23-68:2; 88:24-89:20; 90:4-6; 90:9	I, 403, LO, VA, CM, LEGAL,	Not relevant to the original designation; not relevant (DREs) under FRE 401
90:17-91:13	67:23-68:2	I, 403, LO, LEGAL, ARG	Not relevant to the original designation
91:15-23	67:23-68:2; 133:1-16	I, 403, LO, LEGAL, ARG	Not relevant to the original designation; not

## EXHIBIT 5

			relevant (DREs) under FRE 401
91:25-92:6	92:8-12; 92:16-22; 93:9-15; 133:1-16	I, 403, LO, LEGAL	Not relevant to the original designation; not relevant (DREs) under FRE 401
93:9-22	92:8-12; 92:16-22; 95:25-96:2; 96:6-10; 133:1-16	CM, I, 403, LEGAL, ARG	Not relevant to the original designation; not relevant (DREs) under FRE 401
93:24-94:7	93:9-17; 93:21-22; 94:9-95:6	CM, LO, LEGAL, I, ARG	Not relevant to the original designation
94:12-14	94:9-11; 94:15-95:6	I, LO	No objection to 94:9-11; Defendants object to the remaining counter-designations as speculation, FRE 602; Defendants further object on the grounds that the excerpted testimony would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403
95:7-14	99:13-18; 99:22-23	I, 403, LEGAL	
97:1-7	124:6-125:9	I, 403, LO, F, ARG, CM	Hearsay FRE 801.
98:10-14	97:8-14; 97:17-98:9	I, LO, LEGAL, 403, CM, VA	FRE 602 – lack of foundation, speculation

99:16-23	124:6-125:9; 134:7-19	I, LO, LEGAL, CM, ARG	Hearsay FRE 801
99:25-100:3	77:2-77:6; 99:13-18; 99:22-23	I, VA, LO, LEGAL, CM	
101:22-102:12	133:1-16; 134:7-19	LO, LEGAL, F, CM, ARG	Hearsay FRE 801
102:6-12	133:1-16; 134:7-19	LO, LEGAL, F, CM, ARG, 403	Hearsay FRE 801
102:22-25	102:14-21	I, LEGAL	
103:3-8		VA, F, ARG, S	
103:10-25	134:7-19	F, CM, ARG, VA, I	
107:15-17	97:8-14; 107:6- 14; 107:18- 108:5	I, VA, LEGAL	
108:2-5	97:8-14; 107:6- 108:1	I, CM, VA, LO, F	
111:20-112:8	110:11-21; 112:9-113:2	I	
113:3-16	110:11-21; 113:17-19	I	
125:10-16	124:6-125:9	I	

<b>Donna Price – March 8, 2022 Deposition Designations</b>	<b>Plaintiffs’ Counter Designation</b>	<b>Plaintiffs’ Objections</b>	<b>Defendants’ Counter Designation Objections</b>
20:17-21:3	19:11-20:2; 20:11-16	I, NR, VA	Objection on the grounds that the counter- designations from 19:11-20:2 and 20:11-16 are irrelevant to the

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			original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
22:6-14			
22:15-23:13	23:19-24:6	F, LO, I	Objection on the grounds that the counter- designation from 23:19-24:6 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
27:9-15	24:24-26:9; 26:15- 27:5;27:17-19; 28:2-28:9	F, LO, I, ARG	Objection on the grounds that the counter- designations from 27:17-19 and 28:2- 28:9 are irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object

## EXHIBIT 5

			on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
39:22-24	39:25-40:8	I	Objection on the grounds that the counter-designation from 39:25-40:8 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
42:2-6	41:11-42:1	I	Objection on the grounds that the counter-designation from 41:11-42:1 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing,



## EXHIBIT 5

			distracting, or a waste of time, F.R.E. 403.
43:3-4	42:24-43:2; 43:13-18	I	Objection on the grounds that the counter-designation from 43:13-18 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
43:5-7	43:13-43-18	I	Objection on the grounds that the counter-designation from 43:13-18 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
44:22-24			

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45:23-46:7	44:9-17; 44:25-45:21	I, LEGAL	
46:8-11	44:9-17; 44:25-45:21; 45:23-46:7	I, LEGAL	
47:6-14	46:13-47:3	I, VA	Objection on the grounds that the counter-designation from 46:13-47:3 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
47:21-25	47:16-20; 48:1-48:7	I, LEGAL	Objection on the grounds that the counter-designation from 48:1-48:7 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

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48:8-15	48:1-48:7	I, LEGAL	
48:23- 49:7	48:16-22	I, LO	
49:25-50:12	48:15-20; 48:22-24	I, CM, ARG, LEGAL	Objection on the grounds that the counter-designations from 48:15-20 and 48:22-24 are irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
61:17-21	44:9-14; 57:25-58:10; 58:21-59:5; 61:22-62:12	LO, I, VA	
67:7-10	67:6; 67:11-13; 67:17-21	I, LO, VA, LEGAL, ARG	
70:1-4	69:16-18	I, LO, F, VA, S, LEGAL	
71:23-72:6	71:9-12; 71:17-22	I, LO, F, VA, S, LEGAL	
86:4-90:24		LO, F, H, ARG, LEGAL, CM	
103:17-104:5	103:9-16	I, LO	

105:3-7	104:20-105:2	I, LO, LEGAL	
117:13-20	110:1-14; 116:1-6; 116:12-117:6; 117:21-23	I, LO	
118:7-9		LO, LEGAL	

<b>Jeffrey Schoenberg – October 19, 2021 Deposition Designations</b>	<b>Plaintiffs’ Counter Designation</b>	<b>Plaintiffs’ Objections</b>	<b>Defendants’ Counter Designation Objections</b>
10:8-9	10:7	I, NR	
32:20-33:7		NR	
35:14-36:17	35:3-13	I, H	Counter- designation is not related to designation
36:18-22		I, NR	
37:1-23		H, LO, LEGAL	
38:12-39:8	37:24-38:11	ARG, F, I	
54:15-55:3	54:8-11	I, H, F, LEGAL	
55:12-24	49:12-13; 55:5- 8	S, VA, I	
60:11-21		LO, F, H, LEGAL, S	
61:7–8	60:22-61:2	I, VA	
72:22-73:2	72:14-19	I, F, VA, LEGAL, LO	
73:4-9		F, H, LO, S	
73:10-14		F, H, LO, S	
76:22-77:14	76:18-21	I, ARG, LO	
79:1-10	78:12-24	I, LO, LEGAL	
79:18-80:5	79:12-17; 80:6- 81:7	LO, LEGAL, I	
81:20-82:1			

83:25-84:4	83:16-24	I, LO, LEGAL	
84:6-18	84:5	I, S, LO, LEGAL	
85:11-16	84:5-85:10	I, VA	Counter- designation is not related to designation
92:23-93:4	92:14-21	I	
93:8-19	93:5-7	I, LO, LEGAL	
93:20-96:10			
96:11-16			
96:17-97:16			
99:5-24	98:19-99:4	I, LO, LEGAL, VA	
101:1-17		ARG, LEGAL, LO	
103:4-104:1	102:25-103:2	I, LEGAL, ARG, LO	
104:16-105:17	106:1-20	ARG, LEGAL, S, I, LO	
108:7-13	107:24-108:6	I	
126:10-127:25	126:7-9	I, LEGAL	
132:9-16	132:17-133:3	I	
141:24-145:18		H, F, COM, S, LO, LEGAL	

<b>Coalition for Good Governance - March 17, 2022 30(b)(6) Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
48:4- 48:19			
48:20- 49:19			
51:8-51:15	53:1 – 54:25		
52:17-54:1	55:7 – 55:17		Objection on the grounds that the

## EXHIBIT 5

			counter-designation from 55:7-17 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
58:13-18			
74:14-25	78:1 – 80:21		Objection on the grounds that the counter-designation from 78:1-80:21 is irrelevant to the original designations. Objection on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
84:23-85:5			
86:13-21	89:21- 90:15		Objection on the grounds that the counter-designation from 89:21-90:15 is irrelevant to the

## EXHIBIT 5

			original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
87:17- 88:14			
92:8-94:12			
97:8-100:2			
101:3-22	102: 4-19		Objection on the grounds that the counter- designation from 102:4-19 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
103:25-104:3			
104:10-14			
107:10-22			
112:25-113:13			
116:19-117:12			
117:23-118:3			
119:5-119:9			
119:10- 120:2			

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	128:15- 129:6		Objection on the grounds that the counter-designation from 128:15-129:6 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
128:8-128:14			
131:21-23			
131:24-132:25			
135:19-22			
136:24-137:13			
138:5-25			
142:7-10			
142:11-20			
142:21-144:14			
144:15-22			
154:13-155:4			
158:3- 159:23			
161:5-8			
162:25-163:16			
170:9-22			
171:4-171:22		NR	
174:21-174:23			
180:24-181:13			
181:22-182:6			
182:7-183:03			
183:20-184:16			
184:24-185:11			
187:13-18			



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187:19-188:10			
191:8-19			
199:13-200:4			
206:4-206:12			
231:1-231:7			
	232:5 – 233:16		Objection on the grounds that the counter-designation from 232:5-233:16 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
231:8- 231:14			
234:14-235:09			
239:8- 242:2			
243:2-9			
	247:16 – 248:6		Objection on the grounds that the counter-designation from 247:16-248:6 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing,
246:3-246:8			

			distracting, or a waste of time, F.R.E. 403.
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<b>Laura Digges - September 23, 2021 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
11:18-23			
14:15-24			
14:25-16:21			
17:24-18:14			
18:4-14			
18:15-19			
24:15-26:23	24:6-14		
30:2-21			
31:6-15	31:9-18		
32:24-33:1			
33:2-11			
42:17-19			
46:17-49:13			
49:22-50:3			
50:8-24			
53:2-6			
53:17-24			

<b>William Digges III - September 23, 2021 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
15:8-16			
17:8-22			
20:15-17			
20:5-14			
21:11-13			
21:14-16			
21:17-23			
21:20-22:10			
22:13-21			

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23:6-10			
24:19-22	24:22-25:3		
25:15-26:2			
30:1-5			
30:1-8	30:18-31:12		
31:15-25			
34:2-5			
34:6-13			
34:23-24			
37:21-38:10			
38:25-39:2			
40:7-9			
42:3-9			
42:25-43:6			
46:1-11			
47:19-48:3			
48:4-12			
48:14-18			
48:21- 49:5			
49:11-50:1			
50:6-10			
50:24-51:17	51:18-52:17		
52:18-25			
53:1-6			
53:7-10			

<b>Ricardo Davis - September 29, 2021 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
17:4-18			
17:13-18:20			
21:11-13			
22:11-26:5			
28:6 -22			
28:23-30:9			
30:17-32:18			
35:6-24			
39:6-21			

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40:20-41:8			
41:16-42:9			
42:16-20			
42:21-43:5	43:17-43:23		
43:6-11	44:17-45:9		

<b>Megan Missett - September 28, 2021 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
5:18-21			
15:19-20			
15:24-25			
16:22-25			
17:6-11	17:23-18:1		
18:14-18			
20:6-13			
20:19-22			
27:7-12	27:4-12		
32:20-33:6			
33:13-16			
34-38:2			
35:12-17			
35:18-22			
38:15-22	36:1-17		Counter- designation is not related to designation
40:12-17			
41:15- 42:19			
42:24-43:4			
43:9-13			
47:16-17			
48:16-18			
48:19-21			
49:8-9	50:2-23		
52:22-53:7	53:8-15		
54:13-17			
56:1-8	56:9		

## EXHIBIT 5

57:13-18			
58:14-15			
59:10-12			
59:19-22			
60:2-5			
66:21-67:6			
67:2-6			
67:7-10			
67:22-68:2			
69:8-20			
70:14-18			
73:21-23			
77:3-9			

<b>Philip Stark – December 16, 2022 Deposition Designations</b>	<b>Plaintiffs’ Counter Designation</b>	<b>Plaintiffs’ Objections</b>	<b>Defendants’ Counter Designation Objections</b>
14:16-22			
15:12-15	15:6-11, 15:16-25, 16:19-17:7		
17:08-15			
19:9-20:06			
20:23-21:14	20:7-22		
23:18-21	23:22-24:1		
24:19-20			
26:20-03	26:25-27:3		
27:4-14			
27:17-25			
32:01-34:15			
36:12-19			
38:13-39:10			
39:11-19			
39:20-24	41:13-43:3	VA	
54:09-11			
54:23-55:1	54:15-54:23		
55:2-07			

<b>Kevin Skoglund - December 16, 2022 Deposition Designations</b>	<b>Plaintiffs' Counter Designation</b>	<b>Plaintiffs' Objections</b>	<b>Defendants' Counter Designation Objections</b>
18:3-5			
18:19-24			
22:4-7	22:2-3	NR, LEGAL	
28:24-29:1	28:1-2		Counter-designation is not related to designation
37:16-18	37:15		Counter-designation is incomplete
37:19-23			
37:8-14			
37:24-38:3			
38:4-7			
38:8-39:13			
41:23-42:2			
42:3-24			
43:2-8	43:9-11		
44:10-13	44:14-17		
44:24-45:2	45:3		
45:19-25	46:1		
55:25-56:2	56:3-11		Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.
64:23-66:8	66:12-18	VA	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.

73:8-13	73:6-7	VA	
76:16-77:14	77:15-18		
84:5-17			
88:19-21	88:22-89:3		
104:4-11	103:19-104:3		
108:1-3			
110:1-20	110:21	VA	
111:10-23	111:9		
112:14-113:2		VA	
113:13-18			
114:11-12		IRR	
115:12-14			
119:2-14	119:15-16		Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.
121:9-16	121:17-19, 121:20-122:12		Objection on the grounds that the counter-designations from 121:20-122:12 are irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.